



**FILED**

1-11-16  
04:59 PM

## **EXHIBIT B**

**I.14.11.008**  
**City of Carmel-by-the-Sea Data Request**

**Data Request Number:** City of Carmel-by-the-Sea-Set 2

**Date Sent:** November 19, 2015

**Response Due:** December 5, 2015

Instructions

Please provide a response to:

**Britt K. Strottman**  
**Special Counsel**  
**City of Carmel-by-the-Sea (Carmel)**  
**555 12th Street; Suite 1500**  
**Oakland, CA 94607**  
**bstrottman@meyersnave.com**

For each question, please provide the name of each person who materially contributed to the preparation of the response. If different, please also identify the PG&E witness who would be prepared to respond to cross-examination questions regarding the response.

For any questions requesting numerical recorded data, please provide all responses in working Excel spreadsheet format if so available, with cells and formulae functioning.

For any question requesting documents, please interpret the term broadly to include any and all hard copy or electronic documents or records in PG&E's possession.

For any response that includes information that PG&E wishes to keep confidential, please provide a version of the response with all confidential information redacted.

---

Set two data request

2. Explain your internal records borrowing protocol, discussed on pp. 2-9 to 2-10 of Sumeet Singh's prepared reply testimony.
3. Produce all documents that explain your internal records borrowing protocol, discussed on pp. 2-9 to 2-10 of Sumeet Singh's prepared reply testimony.
4. Describe your procedure for checking out job files, including how the records in the file are maintained and what types of restrictions/permissions a person must have in order to inspect the file.
5. Explain what type of record or data is maintained to track who is inspecting or has inspected a particular job file.

6. Produce the job file borrowing record of the job file relating to the work performed in Carmel by PG&E on March 3, 2014 (Carmel job file).
7. Identify the physical location where the Carmel job file is maintained and whether that location has changed since 2014.
8. Was the Carmel job file available in electronic form in Documentum prior to the subject incident?
9. If the Carmel job file was not available in Documentum, explain what efforts you made to centralize this specific job file prior to the March 3, 2014 explosion.
10. If the Carmel job file was not available in Documentum, explain what efforts you made to make this job file available in electronic form.
11. Explain what efforts you made to verify the accuracy and completeness of the Carmel job file prior to the March 3, 2014 explosion.
12. Identify all person(s) who viewed the Carmel job file from January to March 2014, whether it be in electronic or hard copy form.
13. State whether you will produce the persons identified in the previous data request for deposition.
14. Admit that approximately 2 to 4 days after the March 3, 2014 explosion in Carmel, PG&E employees or agents Kurt Krempotic and Alfonso Carnejo<sup>1</sup> contacted PG&E's former Director of Information Management Compliance and requested the Carmel job file or a portion thereof.
15. Admit that the requestors identified in the previous data request expressly instructed that the Carmel records NOT be tracked by your internal electronic tracking system (explained on p. 2-9 of Sumeet Singh's prepared reply testimony). In other words, admit the requestors wanted no tracking of checking out the Carmel job file.
16. Admit PG&E's former Director of Information Management Compliance objected to the request without tracking the file, but she was instructed to do it anyway.
17. Admit PG&E's former Director of Information Management Compliance was instructed to send the Carmel job file to "corporate."
18. Identify which person(s) viewed the Carmel job file approximately 2 to 4 days (or more, pending on turnaround time) after the March 3, 2014 explosion in Carmel.
19. Admit the person(s) who viewed the Carmel job file approximately 2 to 4 days (or more, pending on turnaround time) after the March 3, 2014 explosion in Carmel was one or more persons in management at its corporate headquarters.

---

<sup>1</sup> Carmel is informed and believes that these are the correct names of the subject PG&E employees or agents. In order to fully respond to this request, Carmel asks that PG&E investigate any spelling variances to ascertain the identity of these individuals.

20. Explain in detail why the person(s) who wished to view the Carmel job file did not want a tracking record of who borrowed the file.
21. Admit that the electronic tracking system was implemented to prevent, in part, lost records.
22. Admit you did not follow internal protocol of tracking the Carmel job file in March 2014.
23. Were any records, data, or documents removed from the Carmel job file in March 2014?
24. If your answer to the previous data request is anything other than an unequivocal no, explain what was removed and why.
25. Were any records, data, or documents inserted into the Carmel job file in March 2014?
26. If your answer to the previous data request is anything other than an unequivocal no, explain what was removed and why.
27. Were any records, data, or documents lost from the Carmel job file in March 2014?
28. If your answer to the previous data request is anything other than an unequivocal no, explain what was lost and how it occurred.
29. Produce all documents, including, but not limited to, notes, emails, or communications (internal or external), regarding PG&E's review of the Carmel job file from January 2014 to March 2014.
30. Admit that your electronic tracking system is a means to prevent "[loose] controls of records borrowing," identified on p. 55 of the P Wood Associates' September 30, 2015 report.
31. Explain whether you follow the General Accountability Recordkeeping Principles and the manner in which you follow it.
32. Admit that circumventing your internal electronic tracking system is contrary to your Asset Management Policy described on p. 2-2 of Sumeet Singh's prepared reply testimony.
33. Have any "retained for life" records been lost as a result of "loose controls of record borrowing?" If so, explain what has been lost and how.
34. Admit that you have information that supports P. Wood Associates' conclusion that PG&E's loose controls of record borrowing has resulted in the loss of records.
35. Explain what your Quality Management group has done to improve the quality of your electronic tracking system.
36. Do you contend you followed your internal Records Information Management policies and procedures regarding the assets related to the March 3, 2014 work performed in Carmel?
37. State all facts to support your contention that you followed your internal Records Information Management policies and procedures regarding the assets related to the March 3, 2014 work performed in Carmel.

38. Produce all documents to support your contention that you followed your internal Records Information Management policies and procedures regarding the assets related to the March 3, 2014 work performed in Carmel.
39. Produce a copy of the Enterprise Records and Information Policy.
40. Produce a copy of the Pricewaterhouse Cooper report conducted on your asset management in 2012.
41. Produce a copy of the internal audit report concerning your quality control process on data conversion identified on p. 2-12 of Sumet Singh's prepared reply testimony.
42. Produce a copy of the internal audit report on your gas operations records prepared in or around February 2014.

2553441.1

## **EXHIBIT C**

**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q02		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q02		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strotzman

**QUESTION 2**

Explain your internal records borrowing protocol, discussed on pp. 2-9 to 2-10 of Sumeet Singh's prepared reply testimony.

**ANSWER 2**

The discussion at pp. 2-9 to 2-10 of PG&E's Reply Testimony references three different types of records: hard copy records stored at local mapping offices; records stored at the corporate records center; and records stored in the centralized electronic repository.

Certain types of hard copy records may be kept at local mapping offices. Each local office has check-out systems that are designed for its specific needs. Many offices utilize a card checkout system. Typically, the checkout cards are filled out with the relevant information (e.g., LanID – a unique employee identification designation, date, job number) and put in place of the record(s) to signal that a particular record(s) is checked-out. When the record(s) is returned, the checkout card is removed. Some offices do not allow records to be borrowed and require the records to be copied instead.

For responses regarding records stored at the corporate records center and in the centralized electronic repository, see PG&E's responses to CarmelCity\_002-Q21 and CarmelCity\_002-Q04, respectively.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q03		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q03		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 14, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 3**

Produce all documents that explain your internal records borrowing protocol, discussed on pp. 2-9 to 2-10 of Sumeet Singh's prepared reply testimony.

**ANSWER 3**

As described in PG&E's response to CarmelCity\_002-Q02, the discussion on pp. 2-9 to 2-10 of PG&E's Reply Testimony references three different types of records: hard copy records stored at local mapping offices; records stored at the corporate records center; and records stored in the centralized electronic repository.

There are no official company standards or procedures that describe the protocol for the check-out/check-in of hard copy records stored at local mapping offices. See PG&E's response to CarmelCity\_002-Q02 for information about the check-out/check-in protocol at local mapping offices.

Attachments Bates numbered PGE\_GDR\_000000020 and PGE\_GDR\_000000024 are procedures for Requesting Records from the Records Center (GOV-7101P-02) and Returning Requested Records Back to the Corporate Records Center (GOV-7101P-03), respectively.

For protocols regarding records stored in the centralized electronic repository, see PG&E's response to CarmelCity\_002-Q05.



**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q04		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q04		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strotzman

**QUESTION 4**

Describe your procedure for checking out job files, including how the records in the file are maintained and what types of restrictions/permissions a person must have in order to inspect the file.

**ANSWER 4**

As defined in PG&E Utility Standard TD-4461S, "Gas As-Built Packages,"<sup>1</sup> a "job file" is the electronic file folder that is created when a job is opened. The contents of a job file are updated as the job progresses through the various stages of initiation, design, and close out. When a job is completed, the records reflecting the work that was performed are scanned and uploaded to the job file, which is the official record of that job.

PG&E maintains job files in SAP. Records are uploaded to SAP, and can then be viewed, modified, and downloaded.

After a job file is created, various PG&E personnel are typically required to upload, view, modify, and possibly download copies of records from the SAP job file in order to complete their specific project tasks during the pendency of the job. Designated "roles" are assigned to PG&E personnel that allow them to view, add, or modify records in the job file. Each role within SAP has its own established permissions and restrictions.

An employee who requires a specific SAP role for such purposes makes an electronic request, which is routed to his or her supervisor for review and approval. Some role requests also require additional approvals. In these cases, a role owner must approve the role assignment, following supervisor approval.

---

<sup>1</sup> Please see attachment W077 to PG&E's November 12, 2015 Reply Testimony.

**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q05		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q05		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 5**

Explain what type of record or data is maintained to track who is inspecting or has inspected a particular job file.

**ANSWER 5**

As described in PG&E's response to CarmelCity\_002-Q04, a job file is electronically stored in SAP. SAP does not track whether a record maintained in a job file was viewed. However, an audit log is created when a record is modified. The audit log lists the type of modifications that were made to the job file, when, and by whom. See attachment Bates numbered PGE\_GDR\_000040754, which depicts a "screen shot" of the records in SAP for the job file relating to work performed in Carmel on March 3, 2014 (under the unique plant maintenance (PM) #30921135) that shows document management activity between May 21, 2013 and September 9, 2015.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q06		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q06		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 6**

Produce the job file borrowing record of the job file relating to the work performed in Carmel by PG&E on March 3, 2014 (Carmel job file).

**ANSWER 6**

The job file relating to the work performed in Carmel by PG&E on March 3, 2014 is located in SAP, under the unique plant maintenance (PM) #30921135 ("Carmel job file"). As described in PG&E's response to CarmelCity\_002-Q05, SAP does not track whether a record maintained in a job file was viewed. PG&E therefore does not maintain a "borrowing record" for the Carmel job file. Please see responses to questions CarmelCity\_002-Q04 and CarmelCity\_002-Q05 for further information.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q07		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q07		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 7**

Identify the physical location where the Carmel job file is maintained and whether that location has changed since 2014.

**ANSWER 7**

The job file for the work performed in Carmel on March 3, 2014 is maintained electronically in SAP. See PG&E's response to CarmelCity\_002-Q04. That location has not changed since 2014.

**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q08		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q08		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 8**

Was the Carmel job file available in electronic form in Documentum prior to the subject incident?

**ANSWER 8**

The job file for the work performed in Carmel on March 3, 2014 was not available in Documentum prior to March 3, 2014. The job file was maintained and available electronically in SAP prior to the subject incident. Please see PG&E's response to CarmelCity\_002-Q04.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q09		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q09		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 9**

If the Carmel job file was not available in Documentum, explain what efforts you made to centralize this specific job file prior to the March 3, 2014 explosion.

**ANSWER 9**

The job file for the work performed in Carmel on March 3, 2014 was centralized and maintained electronically in SAP prior to March 3, 2014. Please see PG&E's response to CarmelCity\_002-Q04.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q10		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q10		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 10**

If the Carmel job file was not available in Documentum, explain what efforts you made to make this job file available in electronic form.

**ANSWER 10**

Please see PG&E's response to CarmelCity\_002-Q09.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q11		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q11		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 11**

Explain what efforts you made to verify the accuracy and completeness of the Carmel job file prior to the March 3, 2014 explosion.

**ANSWER 11**

The following activities are typically conducted during the design and pre-construction phases of gas distribution facilities and PG&E also believes that they were conducted during the design and pre-construction phases of the Carmel job. This process also helps verify the accuracy and completeness of job files prior to proceeding with construction.

As part of the engineering design process, research is conducted to review the related and available historical records of facilities that need to be reconstructed. Examples include as-built records, existing maps, gas service records, leak repairs, and test records. The design work includes reviewing field conditions, existing street and other utility improvements, and local agency requirements. Job design drawings, job instructions, accounting, and service records are prepared for the facility installation and modification. The design is prepared in accordance with applicable regulations and PG&E requirements. Once the design is completed, technical reviews and approvals are performed by the lead designer, engineers, and supervisor.

Next, a centralized processing group reviews the job file to verify that it contains the required records, including design drawings, plat maps, and approved permits, prior to routing to construction.

PG&E's construction organization performs a completeness review, and conducts pre-construction walk-downs and meetings as necessary. They also review and identify any conflicts with design drawings. Construction then plans out the excavation work by requesting other utilities to mark their underground facilities, reviews traffic and street requirements, and determines the best approach to sequencing the work.



**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q12		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q12		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 12**

Identify all person(s) who viewed the Carmel job file from January to March 2014, whether it be in electronic or hard copy form.

**ANSWER 12**

As explained in PG&E's response to CarmelCity\_002-Q04, the Carmel job file would have been available for viewing by anyone authorized with proper SAP system access. No record is kept of person(s) who view job files. See PG&E's response to CarmelCity\_002-Q05.

From January 2014 to March 2014, the Carmel job was in its construction phase. Hard copy printouts of the entire or parts of the job file would have been viewed by various PG&E employees, contractors, and others involved in this phase of the work. PG&E's system does not log or track specific person(s) who may have viewed hard copies of documents from a job file. However, personnel holding some or all of the following positions may view the entire or portions of a job file during the construction phase of the job:

Engineering Estimator  
Associate Distribution Engineer  
Engineering Design Supervisor  
Administrative Support from Order Management Desk  
Project Manager  
Gas Distribution Engineer  
Maintenance & Construction Coordinator  
General Construction Field Engineer  
General Construction and Division Construction Supervisor  
Gas Crew Foreman  
Gas Crew Members  
Gas Estimators  
Gas Public Works Coordinator  
Gas Mapper/s  
Administrative Support from Mapping, Scanning & Attributing Order Closure Desk  
Resource Supervisor  
Scheduler

Field Engineer  
Field Clerk

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q13		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q13		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 13**

State whether you will produce the persons identified in the previous data request for deposition.

**ANSWER 13**

PG&E objects to this request on the ground that it is overbroad, lacks foundation, and is not reasonably calculated to lead to the discovery of admissible evidence.

In addition, as stated in the response to CarmelCity\_002-Q12, PG&E's system does not log or track specific person(s) who may have viewed hard copies of documents from any particular job file, including the Carmel job file.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q14		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q14		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 14**

Admit that approximately 2 to 4 days after the March 3, 2014 explosion in Carmel, PG&E employees or agents Kurt Krempotic and Alfonso Carnejo<sup>1</sup> contacted PG&E's former Director of Information Management Compliance and requested the Carmel job file or a portion thereof.

**ANSWER 14**

PG&E has conducted a reasonable and good faith inquiry regarding the subject matter of this request and has found no information suggesting that any such communications took place, and on that basis, PG&E denies this request.

---

<sup>1</sup> Carmel is informed and believes that these are the correct names of the subject PG&E employees or agents. In order to fully respond to this request, Carmel asks that PG&E investigate any spelling variances to ascertain the identity of these individuals.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q15		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q15		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strotzman

**QUESTION 15**

Admit that the requestors identified in the previous data request expressly instructed that the Carmel records NOT be tracked by your internal electronic tracking system (explained on p. 2-9 of Sumeet Singh's prepared reply testimony). In other words, admit the requestors wanted no tracking of checking out the Carmel job file.

**ANSWER 15**

As set forth in response to CarmelCity\_002-Q14, PG&E has conducted a reasonable and good faith inquiry regarding the subject matter of this request and has found no information suggesting that any such communications took place, and on that basis, PG&E denies this request.

**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q16		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q16		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 16**

Admit PG&E's former Director of Information Management Compliance objected to the request without tracking the file, but she was instructed to do it anyway.

**ANSWER 16**

As set forth in response to CarmelCity\_002-Q14, PG&E has conducted a reasonable and good faith inquiry regarding the subject matter of this request and has found no information suggesting that any such communications took place, and on that basis, PG&E denies this request.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q17		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q17		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 17**

Admit PG&E's former Director of Information Management Compliance was instructed to send the Carmel job file to "corporate."

**ANSWER 17**

PG&E has conducted a reasonable and good faith inquiry regarding the subject matter of this request and has found no information suggesting that any such communications or instructions took place, and on that basis, PG&E denies this request.

**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q18		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q18		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 18**

Identify which person(s) viewed the Carmel job file approximately 2 to 4 days (or more, pending on turnaround time) after the March 3, 2014 explosion in Carmel.

**ANSWER 18**

PG&E defines "job file" in its response to CarmelCity\_002-Q04. For information regarding viewing/inspecting a job file, please see PG&E's response to CarmelCity\_002-Q05.



**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q19		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q19		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 19**

Admit the person(s) who viewed the Carmel job file approximately 2 to 4 days (or more, pending on turnaround time) after the March 3, 2014 explosion in Carmel was one or more persons in management at its corporate headquarters.

**ANSWER 19**

See PG&E's response to CarmelCity\_002-Q18.

PG&E has conducted a reasonable and good faith inquiry regarding the subject matter of this request and has found no information suggesting that any such facts existed, and on that basis, PG&E denies this request.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q20		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q20		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 20**

Explain in detail why the person(s) who wished to view the Carmel job file did not want a tracking record of who borrowed the file.

**ANSWER 20**

See PG&E's response to CarmelCity\_002-Q18.

PG&E has conducted a reasonable and good faith inquiry regarding the subject matter of this request and has found no information suggesting that any such facts existed.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q21		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q21		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 21**

Admit that the electronic tracking system was implemented to prevent, in part, lost records.

**ANSWER 21**

The tracking system described in Chapter 2 (page 2-9, lines 15-19) refers to PG&E's corporate records tracking system. The corporate records center tracking system is comprised of three components: 1) an Access database that logs information about each box of physical records, 2) a dedicated Outlook email inbox that is used to receive requests for records retrieval, and 3) an Excel file that is used to track records check-out. PG&E will submit errata to this testimony to avoid any confusion. A copy of the errata to PG&E's Reply Testimony, Chapter 2, page 2-9, lines 15-19, is attached as document Bates numbered PGE\_GDR\_000040753, and will be served on all parties.

The impetus for updating the corporate records center tracking system was to establish a consistent and standardized method for tracking records related requests received by the corporate records center. One of the ancillary benefits of these improvements could include minimizing the potential risk of lost or misplaced records.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q22		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q22		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 22**

Admit you did not follow internal protocol of tracking the Carmel job file in March 2014.

**ANSWER 22**

PG&E defines "job file" in its response to CarmelCity\_002-Q04.

PG&E has conducted a reasonable and good faith inquiry regarding the subject matter of this request and has found no information suggesting that any such facts existed, and on that basis, PG&E denies this request.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q23		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q23		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 9, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strotzman

**QUESTION 23**

Were any records, data, or documents removed from the Carmel job file in March 2014?

**ANSWER 23**

PG&E defines "Carmel job file" in its response to CarmelCity\_002-Q06. No records or documents were removed from the Carmel job file in March 2014.

In addition to tracking when documents in a job file are modified or records uploaded as described in the response to CarmelCity\_002-Q05, the SAP system produces an audit log when such transactions are performed related to a job file. Additional transactions are also recorded in the audit log that pertain to job management functions such as planned hours, materials, construction dates, construction hours, task dependencies, and line entries for charging time worked to activities, among other items. The SAP audit log includes the type of transaction that occurred, but does not always retain the history of the specific entry or entries that were made. For this reason, PG&E is unable to provide the specific transaction data in the Carmel job file that may have been changed or updated in March 2014, but has provided the transactions performed for the Carmel job file as outlined below.

Attachment Bates numbered PGE\_GDR\_000040755 is the SAP-generated audit log, in the form of an Excel file, summarizing the transactions associated with the Carmel job file. After the March 3, 2014 incident, PG&E transitioned the construction work for completing the Carmel job from a contract crew to a PG&E crew. A series of transactions was posted to the Carmel job file during March 2014 to reflect this change in resources and dates were added to the file,<sup>1</sup> hours forecasted were updated,<sup>2</sup> and positions were designated for work assignments.<sup>3</sup> The log also reflects that the

---

<sup>1</sup> See Bartlett and Gonzalez entries – Long field label "ATP Eligible date."

<sup>2</sup> See Baly entry – Long field label "Forecast work."

<sup>3</sup> See Gonzalez entries – Long field label "Operation short text."

assigned Project Manager changed.<sup>4</sup> An additional transaction was posted to the Carmel job file in March 2014 to correct a labor hours posting error.<sup>5</sup>

---

<sup>4</sup> See Bartlett entry – Long field label “Partner.”

<sup>5</sup> See Laufenberg entry – Long field label “Forecast work.”

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q24		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q24		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 9, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 24**

If your answer to the previous data request is anything other than an unequivocal no, explain what was removed and why.

**ANSWER 24**

Please see the response to CarmelCity\_002-Q23.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q25		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q25		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 9, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 25**

Were any records, data, or documents inserted into the Carmel job file in March 2014?

**ANSWER 25**

PG&E defines "job file" in its response to CarmelCity\_002-Q04. No documents or records were inserted into the PM #30921135 job file in March 2014. See the response to CarmelCity\_002-Q05 and, specifically, attachment Bates numbered PGE\_GDR\_000040754 for the screen shot of the records log.

Transactions were entered that affect data related to the Carmel job file in March 2014. For a description of these changes to PM #30921135 during March 2014, see PG&E's response to CarmelCity\_002-Q23.



**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q26		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q26		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 9, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 26**

If your answer to the previous data request is anything other than an unequivocal no, explain what was removed and why.

**ANSWER 26**

Please see the responses to CarmelCity\_002-Q23, CarmelCity\_002-Q24, and CarmelCity\_002-Q25.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q27		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q27		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 27**

Were any records, data, or documents lost from the Carmel job file in March 2014?

**ANSWER 27**

See the response to CarmelCity\_002-Q04 for the definition of job file. No records, data, or documents were lost from the PM #30921135 job file in March 2014.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q28		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q28		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 28**

If your answer to the previous data request is anything other than an unequivocal no, explain what was lost and how it occurred.

**ANSWER 28**

Please see the response to CarmelCity\_002-Q27.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q29		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q29		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 15, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 29**

Produce all documents, including, but not limited to, notes, emails, or communications (internal or external), regarding PG&E's review of the Carmel job file from January 2014 to March 2014.

**ANSWER 29**

PG&E objects to this request on the grounds that it is overly broad and unduly burdensome, seeks information beyond the scope of this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. PG&E further objects to this request to the extent it seeks materials covered by the attorney-client privilege and attorney work product doctrine. Notwithstanding the foregoing objections, PG&E responds as follows:

As PG&E defined "Carmel job file" in its response to CarmelCity\_002-Q06, the job file relating to the work performed in Carmel by PG&E on March 3, 2014 is located in SAP, under the unique plant maintenance (PM) #30921135. As described in PG&E's response to CarmelCity\_002-Q23, the SAP system produces an audit log when transactions are performed related to a job file. PG&E provided its Carmel job file audit log in its response to CarmelCity\_002-Q23 as attachment Bates numbered PGE\_GDR\_000040755.

For the initial response to this request, PG&E used the Carmel job file audit log (PGE\_GDR\_000040755), columns C, D, and E, and the Column G date range of January 2014 and March 2014, as the basis for identifying four personnel who may have created responsive materials. Those personnel include an application support analyst, two project controls analysts, and a field engineer. This search yielded responsive documents for two of the four personnel, the field engineer and a project controls analyst. Accordingly, PG&E is producing documents created between January 2014 and March 2014 that could be related to PG&E's review of the Carmel job file. See attachments Bates numbered PGE\_GDR\_000040923 through PGE\_GDR\_000040940.

In addition, to the extent PG&E identifies other relevant document custodians, PG&E will conduct a reasonable and diligent search for responsive materials and will supplement this initial production, if necessary.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q29		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q29Supp01		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 15, 2015 (original) December 28, 2015 (supplemental)	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 29**

Produce all documents, including, but not limited to, notes, emails, or communications (internal or external), regarding PG&E's review of the Carmel job file from January 2014 to March 2014.

**ANSWER 29 SUPPLEMENTAL 01**

*Certain attachments to this response have been marked CONFIDENTIAL and are submitted pursuant to a Non-Disclosure Agreement because they include confidential employee and/or customer information.*

PG&E objects to this request on the grounds that it is overly broad and unduly burdensome, seeks information beyond the scope of this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. PG&E further objects to this request to the extent it seeks materials covered by the attorney-client privilege and attorney work product doctrine.

Notwithstanding the foregoing objections, PG&E provided an initial response on December 15, 2015 with documents responsive to this request created between January 2014 and March 2014 that could be related to PG&E's review of the Carmel job file based on the review of e-mails for personnel who appeared in the Carmel job file audit log (PGE\_GDR\_000040755) to have made transactional changes to the Carmel job file in SAP.

Notwithstanding the foregoing objections, PG&E is supplementing the December 15, 2015 response with additional responsive materials. E-mails of all personnel who charged time to the Carmel job were subsequently reviewed, as were e-mails of PG&E personnel engaged in the search for the missing plastic inserted as-built record associated with the involved main in the Carmel incident. The resulting responsive documents are provided as attachments Bates numbered PGE\_GDR\_000042693 through PGE\_GDR\_000042704, PGE\_GDR\_000042714 through PGE\_GDR\_000042915, and PGE\_GDR\_000042926 through PGE\_GDR\_000042933.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q30		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q30		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 30**

Admit that your electronic tracking system is a means to prevent "[loose] controls of records borrowing," identified on p. 55 of the P Wood Associates' September 30, 2015 report.

**ANSWER 30**

PG&E does not agree with this characterization or with the PWA Report's assertion that PG&E has "[loose] controls on records borrowing." See response to CarmelCity\_002-Q21.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q31		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q31		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 31**

Explain whether you follow the General Accountability Recordkeeping Principles and the manner in which you follow it.

**ANSWER 31**

PG&E has no knowledge of General Accountability Record Keeping Principles; however, PG&E is aware of the Generally Accepted Record Keeping Principles developed and published by ARMA International. PG&E described its efforts to implement the Generally Accepted Record Keeping Principles on pages 14-15 in its Initial Report, filed December 22, 2014.

In addition, PG&E discussed in its Reply Testimony at page 2-8, lines 1-10, that the Gas Operations' Records & Information Management (RIM) team is using the Information Governance Maturity Model (IGMM) for records management, developed by ARMA International, and has developed a project plan and roadmap to implement a program that supports achievement of Level 3 Maturity ("Essential").<sup>1</sup>

PG&E's Initial Report in Response to the OII discusses the RIM initiatives that follow IGMM Principles.<sup>2</sup> As noted in Reply Testimony at page 2-8, lines 13 – 25, Gas Operations RIM's continued progress in following the IGMM Principles and is evaluated by Lloyds Register typically every six months.

---

<sup>1</sup> Achievement of Level 3 Maturity ("Essential") means that Gas Operations RIM follows relevant compliance laws and regulations, and systematically carries out its creation and capture of records.

<sup>2</sup> See PG&E's Initial Report to OII, I.14-11-008, pp. 14-16.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q32		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q32		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 32**

Admit that circumventing your internal electronic tracking system is contrary to your Asset Management Policy described on p. 2-2 of Sumeet Singh's prepared reply testimony.

**ANSWER 32**

PG&E does not agree with this assertion. PG&E's Gas Asset Management Policy<sup>1</sup> describes the principles for PG&E employees and contractors to observe, and does not specifically reference the details on how to achieve the identified principles including the requirement for an "internal electronic tracking system."

---

<sup>1</sup> PG&E's Gas Asset Management Utility Policy TD-01, Rev.1, was included as Attachment W0008 to PG&E's November 12, 2015 Reply Testimony.



**PACIFIC GAS AND ELECTRIC COMPANY  
Gas Distribution Recordkeeping OII  
Investigation 14-11-008  
Data Response**

PG&E Data Request No.:	CarmelCity_002-Q33		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q33		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 33**

Have any "retained for life" records been lost as a result of "loose controls of record borrowing?" If so, explain what has been lost and how.

**ANSWER 33**

PG&E acknowledges that we have gaps in some records, including the record of inserted plastic main, which was missing from the Carmel job file and has not been located. However, as stated in Chapter 2, on pages 2-9 and 2-10, PG&E does not have knowledge of any "loose controls of records borrowing," and is therefore not aware of a basis for the assertion that the aforementioned record, or any "retained for life records" that have been lost, were lost as a result of "loose controls of record borrowing."

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q34		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q34		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strotzman

**QUESTION 34**

Admit that you have information that supports P. Wood Associates' conclusion that PG&E's loose controls of record borrowing has resulted in the loss of records.

**ANSWER 34**

PG&E does not agree with this assertion. As stated in Chapter 2, on pages 2-9 and 2-10, PG&E does not have knowledge of any "loose controls on records borrowing," nor has PWA provided a source for its systemic conclusion.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q35		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q35		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 35**

Explain what your Quality Management group has done to improve the quality of your electronic tracking system.

**ANSWER 35**

The Gas Operations Quality Management team does not review the corporate records center tracking system (described in PG&E's response to CarmelCity\_002-Q21). The Gas Operations Quality Management team is responsible for core Gas Operations services. The corporate records center tracking system is a corporate service tool, which is outside of the Gas Operations Quality Management team's scope of work.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q36		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q36		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strotzman

**QUESTION 36**

Do you contend you followed your internal Records Information Management policies and procedures regarding the assets related to the March 3, 2014 work performed in Carmel?

**ANSWER 36**

PG&E objects to this request on the ground that it is overbroad, vague, and ambiguous in its use of the phrase "your internal Records Information Management policies and procedures regarding the assets related to the March 3, 2014 work performed in Carmel."

The Records Information Management policies and procedures that would generally be applicable in whole or in part to the records relating to the work performed in Carmel on March 3, 2014 include the Gas Operations Vital Records Management - Utility Standard TD-4017S,<sup>1</sup> the Records Management Policy – Gov 01 (attached as document Bates numbered PGE\_GDR\_000000004), the Records Management Standard - GOV-7101S, Rev. 0 (attached as document Bates numbered PGE\_GDR\_000006120), and the Gas Operations Policy: TD-01, Rev. 0 (attached as document Bates numbered PGE\_GDR\_000040756). PG&E has not performed an analysis to determine whether, to the extent they might be applicable, these policies and procedures were specifically followed with respect to records relating to the work performed in Carmel. However, information relating to the work performed in Carmel is tracked in SAP as described in the response to CarmelCity\_002-Q05.

---

<sup>1</sup> See attachment W011 to PG&E's November 12, 2015 Reply Testimony.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q37		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q37		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 37**

State all facts to support your contention that you followed your internal Records Information Management policies and procedures regarding the assets related to the March 3, 2014 work performed in Carmel.

**ANSWER 37**

See response to CarmelCity\_002-Q36.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q38		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q38		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 8, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strotzman

**QUESTION 38**

Produce all documents to support your contention that you followed your internal Records Information Management policies and procedures regarding the assets related to the March 3, 2014 work performed in Carmel.

**ANSWER 38**

See PG&E's response to CarmelCity\_002-Q36.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q39		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q39		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strotzman

**QUESTION 39**

Produce a copy of the Enterprise Records and Information Policy.

**ANSWER 39**

Provided as attachment Bates numbered PGE\_GDR\_000006118 through PGE\_GDR\_000006119 is the Corporation Policy, GOV-01: Records Management Policy.

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q40		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q40		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 40**

Produce a copy of the Pricewaterhouse Cooper report conducted on your asset management in 2012.

**ANSWER 40**

*The attachment to this response has been marked CONFIDENTIAL and is submitted pursuant to a Non-Disclosure Agreement because it includes confidential employee and sensitive business information.*

PG&E is not aware of a Pricewaterhouse Cooper report conducted on asset management for Gas Operations in 2012. PG&E is aware of a Pricewaterhouse Cooper report on Records and Information Management, dated March 31, 2012, and provides that report herein as document Bates numbered PGE\_GDR\_000024622 through PGE\_GDR\_000024736.



**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q41		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q41		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:	Sumeet Singh	Requester:	Britt K. Strottman

**QUESTION 41**

Produce a copy of the internal audit report concerning your quality control process on data conversion identified on p. 2-12 of Sumeet Singh's prepared reply testimony.

**ANSWER 41**

*The attachment to this response has been marked CONFIDENTIAL and is submitted pursuant to a Non-Disclosure Agreement because it includes confidential employee information.*

Provided as attachment Bates numbered PGE\_GDR\_000008370 through PGE\_GDR\_000008372 is the April 24, 2015 internal audit report on "Pathfinder Progress – GIS Gas Distribution Maps."

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Gas Distribution Recordkeeping OII**  
**Investigation 14-11-008**  
**Data Response**

PG&E Data Request No.:	CarmelCity_002-Q42		
PG&E File Name:	GasDistributionRecordkeepingOII_DR_CarmelCity_002-Q42		
Request Date:	November 19, 2015	Requester DR No.:	002
Date Sent:	December 7, 2015	Requesting Party:	City of Carmel
PG&E Witness:		Requester:	Britt K. Strottman

**QUESTION 42**

Produce a copy of the internal audit report on your gas operations records prepared in or around February 2014.

**ANSWER 42**

*PG&E objects to this request on the ground that it is not reasonably calculated to lead to discovery of admissible evidence to the extent it seeks documents that are outside the scope of this proceeding as defined by the Commission's April 10, 2015 Scoping Memo and Ruling. The attachments to this response have been marked CONFIDENTIAL and are submitted pursuant to a Non-Disclosure Agreement because they include confidential employee information.*

Without waiving and notwithstanding the objection, PG&E responds as follows. PG&E is not aware of an Internal Audit report on gas distribution operations records generally that was prepared in or around February 2014. However, PG&E has identified the Internal Audit reports listed below and produced herewith, which refer to gas distribution records and are dated in or around February 2014. With the exception of these documents, other Internal Audit reports dated in or around February 2014 are outside the scope of this proceeding.

Internal Audit Report	Bates No. Begin	Bates No. End
February 5, 2014: Gas Asset Mapping Duration Metric – Testing of 2013 Results (14-009)	PGE_GDR_000008193	PGE_GDR_000008195
February 5, 2014: Review of Gas Dig-In Investigations and Claims (14-010)	PGE_GDR_000008196	PGE_GDR_000008199

## **EXHIBIT G**

Subpoena Requested by:

Britt Strotzman (SBN: 209595)  
(Name)  
555 12<sup>th</sup> Street, Suite 1500  
(Address)  
Oakland, Ca 94607  
(Telephone No.)  
510. 808. 2000  
Representing: City of Carmel-By-The-Sea  
(Complainant, Defendant, Other)

## Public Utilities Commission of the State of California

(Caption of Proceeding) I-14-11-008  
Order instituting investigation and  
order to show cause on the  
Commission's own motion into the  
operations and practices of Pacific  
Gas and Electric Company with respect  
to Facilities Record for its natural  
gas distribution systems pipelines

### SUBPOENA OR SUBPOENA DUCES TECUM

☐ Hearing ☒ Deposition  
(Interview only)

THE PEOPLE OF THE STATE OF CALIFORNIA,

TO: Leslie Banach (Special Agreement)

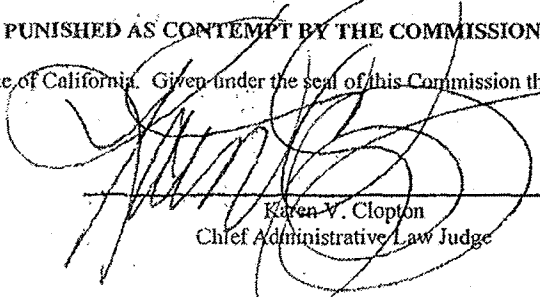
You are ordered to appear before the California Public Utilities Commission located at Meyer Lane 575 Market  
St., Suite 2080, S.F., CA 94105 on 10-29-2015 at 2:00 pm  
to testify as a witness in this matter unless you make a special agreement with Britt Strotzman  
(Name of Attorney or Party requesting Subpoena)

- ☒ Ordered to appear in person.
- ☐ Ordered to appear in person and produce the records described in the attached affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records is required by this subpoena.
- ☐ Not required to appear in person if you produce the records described in the attached affidavit in compliance with Evidence Code Sections 1560 and 1561.

If you have been subpoenaed as a witness, you are entitled to witness fees and mileage actually traveled, as provided by law. You may request one day's witness and mileage fees for travel to and from the place you are required to appear. You may demand these fees at the time of service from the process server or from the party or attorney requesting the subpoena. If they are not paid or tendered at that time, or unless the subpoena was obtained by the Commission staff, you are not required to appear (Public Utilities Code Section 1791).

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THE COMMISSION.**

By order of the Public Utilities Commission of the State of California. Given under the seal of this Commission this 29<sup>th</sup> day of October 2015.

  
Karen V. Clopton  
Chief Administrative Law Judge

PROOF OF SERVICE OF SUBPOENA

I served this ☒ subpoena/ ☐ subpoena duces tecum and supporting affidavit by delivering a copy personally to the person served as follows.

Person served (name) Leslie Banach

Address where served 575 Market St., Suite 2080

San Francisco, CA 94105

Date of delivery Oct. 29, 2015

Time of delivery \_\_\_\_\_

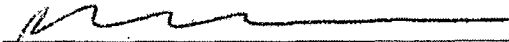
Witness fees (check one)

☐ Were demanded and paid or tendered (Amount \$ \_\_\_\_\_)

☒ Were not demanded or paid

Fees for service \$ \_\_\_\_\_

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on 10/29/15 at San Francisco, California.  
(date) (city)



(Signature)

## **EXHIBIT J**



555 12<sup>th</sup> Street, Suite 1500  
Oakland, California 94607  
tel (510) 808-2000  
fax (510) 444-1108  
www.meyersnave.com

Britt K. Strottman  
Attorney at Law  
bstrottman@meyersnave.com

December 2, 2015

**Via U.S. Mail and Email**

Marie L. Fiala  
Sidley Austin LLP  
555 California Street, Suite 2000  
San Francisco, CA 94104

**Re: PG&E Gas Distribution OII (I.14-11-008)**

Dear Ms. Fiala:

This letter responds to your letter dated December 2, 2015. To answer your questions, as we stated in our letter to you dated December 1, 2015, the City of Carmel-by-the-Sea did not depose Ms. Banach October 29, 2015 and we have not received any documents in response to the subpoena.

Very truly yours,

Britt K. Strottman  
Attorney at Law

BKS:kkky

c: Mike Calhoun, Director of Public Safety/ Chief of Police Carmel Police Department  
and Interim City Administrator (via Email)  
Steve Meyers, Special Counsel (via Email)

## **EXHIBIT Q**





555 12<sup>th</sup> Street, Suite 1500  
Oakland, California 94607  
tel (510) 808-2000  
fax (510) 444-1108  
www.meyersnave.com

Britt K. Strottman  
Attorney at Law  
bstrottman@meyersnave.com

December 30, 2015

**Via U.S. Mail and Email**

Marie L. Fiala  
Sidley Austin LLP  
555 California Street, Suite 2000  
San Francisco, CA 94104

**Re: PG&E Gas Distribution OII (I.14-11-008)**

Dear Ms. Fiala:

Thank you for your December 28, 2015 meet and confer letter. After due consideration, Carmel will not provide supplemental responses to PG&E's data requests. PG&E's data requests essentially seek Carmel's attorney's notes, research, documents, statements, and information prepared through an attorney-led interview of an individual regarding pending litigation and a pending police incident investigation. These requests attempt to reveal the substance and source of internal discovery conducted by Carmel and betray the very purpose of work product protection. (See Code. Civ. Pro. § 2018.020.) In other words, PG&E attempts to take undue advantage of Carmel's industry and efforts. (Code. Civ. Pro. §§ 2018.020, 2018.040; *Dowden v. Superior Court* (1999) 73 Cal. App. 4th 126, 133.)

In *Coito v. Superior Court* (2012) 54 Cal. 4th 480, the California Supreme Court held that witness statements obtained through an attorney-directed interview are entitled to work product protection. (*Id.* at 494 ["in light of the origins and developments of the work product privilege in California, we conclude that witness statements obtained as a result of an interview conducted by an attorney, or by an attorney's agent at the attorney's behest constitute work product"].) The *Coito* court held that where a witness statement reveals an attorney's impressions, conclusions, points, or legal research, the statement is entitled to absolute privilege. (*Id.* at 495.) Even where witness statements obtained by an attorney do not reveal the attorney's thought process, they are nevertheless entitled to qualified work product protection. (*Id.* ["even when an attorney who exercises no selectivity in determining which witnesses to interview...the attorney has expended time and effort in identifying and locating each witness, securing the witness's willingness to talk, listening to what the witness said, and preserving the witness statements for possible future use."].)

Carmel believes the information it obtained from this individual, who has yet to be listed as a “witness” in this proceeding, and any corresponding writings are entitled to absolute work product protection because it reflects its attorney’s impressions, analysis, and opinions and are thus not discoverable under any circumstance. (Code Civ. Proc. 2018.030(a).) The questions posed to the individual, and her answers, reflect the attorneys’ theories and strategy in this case. Even if the Court opines such information is subject to qualified protection under Code Civ. Procedure section 2018.030(b), PG&E cannot show the prerequisite prejudice or injustice. Your letter notes that the “public’s interest in disclosure far outweighs any interest Carmel might have in keeping the information secret.” This is not the applicable legal standard, but a standard under the Public Records Act. On the contrary, this individual is equally available to PG&E and PG&E is free to depose or interview this individual to obtain the facts PG&E seeks. Indeed, this individual is the best source for the information sought in the data requests. Any effort to obtain information known to Ms. Banach through the notes, reports, and impressions of an interview with her by Carmel’s attorneys is contrary to legal authority and would prejudice my client.

Your letter also takes issue with Carmel’s objection that the information and documents sought are not discoverable because they are part of a pending police incident investigation. Please note that Carmel’s Chief of Police participated in the interview of this individual as part of his official duties as a peace officer investigating the March 3, 2014 explosion. (See Evid. Code § 1040.) You are not entitled to know even this, but in the interest of being reasonable we so inform you. The information sought is also not discoverable for this reason.

I note that your meet and confer letter curiously cites no legal authority in support of your position that no privilege applies to an attorney-led witness interview during pending litigation and police incident investigation. If you believe there exists legal authority on point, please forward it to my attention prior to filing your motion to compel.


More fundamentally, we caution that we believe you and your client are engaging in an artifice to obstruct these investigatory proceedings. It is public information that the subject individual was a former officer and executive of PG&E charged with the creation of a records database, records management, and records retrieval system. (See I.11-02-016, PG&E’s Response to CPSD’s Reports: Records Management Within the Gas Transmission Division of PG&E Prior to the Natural Gas Transmission Pipeline Rupture and Fire, San Bruno, California, September 9, 2010 and Report and Testimony of Margaret Felts, Testimony of Witnesses – PG&E Company Expert Report of Maura L. Dunn, MLS, CRM, PMP citing Testimony of Leslie Banach, Director – Information Management Compliance, May 15-16, 2012 at Pages MD-58; MD-66 to MD-68.) In this proceeding, PG&E’s own data responses to the parties herein state that she is still listed on various records forms. This OII is about record keeping. We are informed and believe (as stated in our data responses) that this individual was terminated by PG&E with a severance that prohibited any disclosures to anyone at any time for whatever reasons without a subpoena, in essence a “gag order.” Now that a subpoena has been issued by this Commission for us to conduct an interview, PG&E now claims it is entitled to the substance of that interview because a

Marie L. Fiala  
December 30, 2015  
Page 3

subpoena was necessary. One could infer that PG&E and counsel have engaged in a deliberate attempt to prevent the availability of this individual for any purposes relevant to this OII, including for purposes of being a whistleblower. We certainly hope that inference is without merit.

I suggest that we have a conversation by phone or in person in order to meaningfully meet and confer on the issue and I will make myself available accordingly.

Very truly yours,



Britt K. Strottman  
Attorney at Law

BKS:EED

c: Mike Calhoun, Director of Public Safety/ Chief of Police Carmel Police Department  
and Interim City Administrator (via Email)  
Steve Meyers, Special Counsel (via Email)

2568254.1

## **EXHIBIT S**

**From:** [Strottman, Britt](#)  
**To:** [Fiala, Marie](#)  
**Cc:** [Meyers, Steven](#); [Hill, Joshua](#); [Collier, Elizabeth \(Law\)](#)  
**Subject:** RE: PG&E/motion to compel issues  
**Date:** Thursday, December 31, 2015 9:49:47 AM  
**Attachments:** [image001.png](#)

---

Ms. Fiala, I didn't receive a voicemail from you yesterday, but I am free to talk to you today if needed. I am out of town, but can be reached on my cell at 415-310-7523. The answer to question number one is "no." The remainder questions are irrelevant. Furthermore, Carmel will not stipulate that it will not raise any of the contentions set forth in the data requests in the OII. PG&E has already denied the existence of any facts supporting those contentions. Without waiving our objections and without waiving privileges, the factual bases for the questions posed in our data request at issue are derived from our own investigation and analysis including, but not limited to, our interview of Ms. Banach.

Carmel has repeatedly attempted to meet with PG&E to discuss its concerns about the integrity of its gas distribution system, public safety and records keeping problems. The City believes that PG&E has patronized and marginalized the City and has been less than forthright and forthcoming. Mr. John's unceremonious cancellation of meetings with the Mayor and City leaders still rankles. We further stand by the comments made in our letter to you yesterday.

Please let me know if you have any additional questions. We are available to meet and confer after January 3 2016. Thank you, Britt

**Britt K. Strottman**  
Principal

**meyers | nave**

[email](#) [vCard](#) [bio](#) [website](#)

office: 510.808.2000 mobile: 415.310.7523

Oakland • Los Angeles • Sacramento • San Diego • San Francisco • Santa Rosa

Confidentiality Notice: This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

---

**From:** Fiala, Marie [<mailto:mfiala@sidley.com>]  
**Sent:** Wednesday, December 30, 2015 3:31 PM  
**To:** Strottman, Britt  
**Cc:** Meyers, Steven; Hill, Joshua; Collier, Elizabeth (Law)  
**Subject:** PG&E/motion to compel issues

Dear Ms. Strottman:

I left you a message at 1:25 today, inviting a telephone discussion of the pending discovery issues. Since I haven't heard back from you yet, and given the urgent time frame, I'm writing to clarify that PG&E is not seeking production of witness statements, witness interview notes, internal memoranda, or similar qualified work product materials that may have been created in connection with your interview(s) of Leslie Banach. Rather, our requests seek production of documents as to which no claim of privilege protection could legitimately be asserted.

If you would provide unambiguous answers to the following questions, we could potentially resolve a large part, or even all, of the disputed issues:

1. Did Ms. Banach provide any documents, whether hardcopies, emails, electronic files, or in any other form, to Carmel (Q4, 10)?
2. If the answer to #1 is yes, will Carmel produce such documents to PG&E?
3. If the answer to #3 is no, on what basis does Carmel refuse to produce such documents?

The remainder of the disputed data requests (Q13-Q23) are contention interrogatories seeking to elicit the facts, if any, underlying assertions made in Carmel's November 19 data requests. If Carmel is willing to stipulate that it will not raise any of the contentions set forth in the data requests in the OII, PG&E does not require further responses. However, if Carmel is unwilling to stipulate and so keeps open the possibility that it will raise any of the contentions at the hearing, PG&E is entitled to discover the facts underlying the contentions prior to hearing. Cal. Code Civ. Proc. 2030.010(b).

Again, these requests do not ask Carmel to produce witness statements, interview notes, or other similar materials. Will Carmel agree to either stipulate that it is not making the contentions or, if it is unwilling to so stipulate, supplement its responses to the contention interrogatories by stating all facts called for by the requests?

As we have very little time prior to the scheduled hearing to have a motion heard, please let us have your written response to the above by 12:00 p.m. on December 31.

Regards,

Marie Fiala  
**MARIE FIALA**  
Partner  
Sidley Austin LLP  
**Mailing Address:**  
555 California Street, Suite 2000  
San Francisco, CA 94104

**Temporary Physical Address (effective 10/12/15):**  
315 Montgomery Street, 12th Floor  
San Francisco, CA 94104

+1 415 772 1278  
[mfiala@sidley.com](mailto:mfiala@sidley.com)  
[www.sidley.com](http://www.sidley.com)



**SIDLEY AUSTIN LLP**

\*\*\*\*\*

This e-mail is sent by a law firm and may contain information that is privileged or confidential.  
If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately.

\*\*\*\*\*

## **EXHIBIT T**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation And Order to Show Cause on the Commission's Own Motion into the Operations and Practices of Pacific Gas and Electric Company with Respect to Facilities Records for its Natural Gas Distribution System Pipelines.

**FILED**  
**PUBLIC UTILITIES COMMISSION**  
**NOVEMBER 20, 2014**  
**SAN FRANCISCO OFFICE**  
**I.14-11-008**

**ORDER INSTITUTING INVESTIGATION**  
**AND ORDER TO SHOW CAUSE**

**I. INTRODUCTION AND STATEMENT OF PURPOSE**

In response to several incidents, by this order, the California Public Utilities Commission ("Commission") institutes a formal investigation to determine whether Pacific Gas and Electric Company ("PG&E"), violated any provision or provisions of the California Public Utilities Code ("Public Utilities Code"), Commission general orders or decisions, other applicable rules or requirements pertaining to safety recordkeeping for its natural gas distribution service and facilities, and/or other state or federal laws. This investigation will review and determine whether PG&E's recordkeeping practices for its gas distribution system have been unsafe and in violation of the law.

The Respondent is PG&E, a privately-owned public utility, subject to the safety and rate jurisdiction and regulation of this Commission, and to California law and the Commission's general orders, rules, and decisions. The Commission enforces a variety of federal and state laws that impose safety requirements pertaining to the design, construction, inspection, testing, operation, and maintenance of utility gas gathering, transmission, and distribution piping systems, and for the safe operation of such lines and equipment. This investigation will assess PG&E's compliance with the law pertaining to safety-related recordkeeping for natural gas distribution pipelines.



This Order provides notice that the Commission will determine whether PG&E has violated the Commission's general orders or other applicable authority pertaining to safety-related recordkeeping for natural gas distribution pipelines. This Order also directs PG&E to show cause as to why the Commission should not find violations in this matter, and why the Commission should not impose penalties, and/or any other forms of relief, if any violations are found. The order also directs PG&E to respond to certain questions and provide specified information to the Commission.

## **II. DESCRIPTION OF RECENT NATURAL GAS DISTRIBUTION SYSTEM INCIDENTS**

### **A. Castro Valley – September 17, 2010 - Incident G 20100917-01**

On September 17, 2010, at approximately 10:19 am, a third party contractor digging a new storm drain for the City of Castro Valley struck a 1-inch plastic gas service line at a location on San Miguel Avenue in Alameda County. This caused the release of natural gas into the atmosphere, and a service interruption for four customers. There were no fatalities or injuries.

According to the Commission's Safety and Enforcement Division ("SED") Investigation Report (see Appendix A-1), PG&E had failed to delineate the pipe sufficiently due to a mapping error. The mapping error resulted from incorrect field documentation of the historical gas service records. Notably, both the 2005 and 2010 five-year leak surveys were conducted based on the erroneous maps. While PG&E stated that it had taken steps to locate underground facilities, including checking the surrounding area for service meters, the SED investigator found a meter at a nearby address on San Miguel Avenue that was visible from the street and was easily located. PG&E asserted that the mapping error had been subsequently corrected. PG&E also admitted that plat map errors are found throughout its service territory.

The SED Investigation Report claims that PG&E violated Title 49 Code of Federal Regulation ("CFR") §192.605(a), §192.605(b)(3), and/or Title 49 CFR §192.13(c). In support of these allegations, SED asserts that PG&E did not have accurate construction records, maps, and operating history available to appropriate operating

personnel, and that PG&E did not adequately follow PG&E's UO Standard S4460 which states, in part:

“Area and district superintendents and pipeline and facility engineers shall be responsible for ensuring that their assigned copies of the operating maps and operating diagrams are updated and accurate.”

**B. Morgan Hill – June 21, 2012 - Incident G 20120621-01**

On June 21, 2012, at approximately 8:50 am, a third party contractor excavating to install a water line struck and damaged an unmarked 3/4-inch steel gas service line causing a release of natural gas. One customer lost gas service and two structures were evacuated as a precaution. There were no injuries or property damage as a result of this incident.

According to the SED Investigation Report (see Appendix A-2), PG&E had failed to locate and mark the 3/4-inch steel service line. PG&E admitted that the damaged service line was built in 1951 and cut (deactivated) at the property line (“P/L”) in 1966. The crew at that time only wrote a note in "Remarks" section of the original 1951 Gas Service Record (“GSR”) stating that “service was cut back 8 feet out from P/L.” The plat map was not updated to show it as a stub (a short section of pipe that is capped and without a riser). This stub also did not appear on PG&E's five-year gas stub review program (Utility Procedure TD-9500P-16).

PG&E also admitted that its employee did not follow internal procedures. For example, the employee did not contact the mapping department before the incident when he failed to locate the stub. In addition, the employee did not communicate to the contractor that there was a possibility of gas line that appears in plat 3541-G1, block 12, which he could not locate.<sup>1</sup> During the investigation by PG&E, the employee stated that pressure was felt from a supervisor to complete work and assist a colleague with another USA ticket. Additionally, the Supervisor was made aware of employee opinions that the work load was extremely difficult to manage.

---

<sup>1</sup> There was also inadequate documentation in IRTNet regarding the activity of the employee.

PG&E further admitted that on the day of the incident, the Gas Foreman on the repair crew did not submit a new GSR indicating that the damaged gas service was deactivated at the main after making the repairs. SED believes that PG&E notified appropriate personnel of this issue and requested a new GSR be submitted to local Gas Mapping.

The SED Investigation Report claims that PG&E violated Government Code §4216.3(a)(1), Title 49 CFR §192.605(b)(3), and/or 49 CFR §192.605(a). In support of these allegations, SED asserts that PG&E failed to mark the service line that was hit, failed to provide its employees with accurate maps and available information regarding its gas infrastructure, failed to review its information and maps for accuracy, and failed to follow its own procedures.

**C. Milpitas – October 10, 2012 - Incident G 20121010-01**

On October 10, 2012, at approximately 12:45 pm, PG&E lost service to 987 customers while a gas construction crew was replacing a six-inch steel gas distribution main with a new four-inch plastic gas distribution main in the vicinity of Montague Expressway and Great Mall Parkway in Milpitas. There were no injuries or property damage as a result of this incident.

According to the SED Investigation Report (see Appendix A-3), PG&E had ran an engineering model and determined that the system would have sufficient back feed to maintain service to customers. However, PG&E admitted that a non-emergency distribution main valve that the engineering model showed to be in the open position was actually in the closed position, preventing back feed to the affected customers. The valve position had been manually transcribed as “OPEN” in PG&E’s model based on the plat sheet, which resulted in the inaccuracy in the model conducted prior to the distribution main transfer.

The SED Investigation Report claims that PG&E violated Title 49 CFR §192.605(a) and/or 49 CFR §192.605(b)(3). The SED Investigation Report also noted PHMSA Advisory Bulletin ADB-02-03 reminding Operators to keep maps and records

up-to-date as pipeline construction and modifications take place. In support of the allegations, SED asserts that PG&E failed to monitor pressure gauges while the job was in progress as required by PG&E standards A-93.1 and D-S0454, and that the operating position for valve 3352-E2A reflected on the map did not match the actual field operating position, which thereby provided inaccurate information to PG&E personnel.

**D. Milpitas – March 4, 2013 - Incident G 20130304-01**

On March 4, 2013, at approximately 1:30 pm, a third party contractor dug into a two-inch plastic distribution main while excavating to install a storm drain. The damaged pipe branched off a main running under Main Street near Great Mall Parkway. There were no injuries, no fatalities and no ignition.

According to the SED Investigation Report (see Appendix A-4), the facilities were not accurately marked. PG&E admitted that its crew had marked the pipe location six feet away from the actual pipe location. PG&E admitted that the Electronic Test Station (“ETS”) station installed in 1994 for this buried pipeline was not marked on the plat map for the area, so that the mark and locate technician was not able to use the most accurate tracer wire lead point for his location survey.

The SED Investigation Report claimed that PG&E violated Government Code §4216.3(a)(1) which is a requirement from participation in the One-Call program to fulfill the Damage Prevention rules under Title CFR 49 §192.614, for the failure to mark the approximate location<sup>2</sup> of the distribution main within 24 inches of the subsurface facilities.

**E. Mountain View – July 30, 2013 - Incident G20130730-02**

On July 30, 2013, at approximately 12:30 pm, a PG&E crew welded a tap fitting onto a 1 ¼ inch steel service line casing in Mountain View. The PG&E welding crew was unaware that the 1 ¼ inch steel service line casing had an inserted one-inch

---

<sup>2</sup> Government Code 4216(a) defines ‘Approximate location of subsurface installations’ as “a strip of land not more than 24 inches on either side of the exterior surface of the subsurface installation.”

plastic line which was unmapped. The one inch plastic insert melted causing a release of gas which went unnoticed due to the gas traveling down the steel service line casing away from the work area. There were no injuries, fatalities or property damage as a result of this incident.

According to the SED Investigation Report (see Appendix A-5), the crew foreman utilized construction documents for the replacement project as well as the plat map. Neither indicated the presence of the plastic insert. PG&E admitted that sometime between 1972 and the mid-1980s the plastic line had been inserted. The date of pipe manufacture does not narrow down the installation date, as PG&E Gas Standard A-93.1 Revision 1 dated 04-17-73 only limits the length of time that materials can be stored in direct sunlight to no more than one year and does not limit the length of time that polyethylene can be stored.

The SED Investigation Report claimed that PG&E violated Title 49 CFR §192.605(b), for its failure to provide accurate information about the service line to its workers. The SED Investigation Report also noted PHMSA Advisory Bulletin ADB-02-03 reminding Operators to keep maps and records up-to-date as pipeline construction and modifications take place.

**F. Carmel – March 3, 2014 – Incident G20140303-01**

On March 3, 2014, at approximately 11:15 am, a natural gas explosion destroyed a house located in the city of Carmel-by-the-Sea. Prior to the explosion, a PG&E welding crew was preparing to tie-in the gas distribution main along 3rd Avenue into the newly installed plastic main on Guadalupe Street. The estimated cost of the damage involved in this case is \$302,000. There were no injuries or fatalities as a result of this incident.

According to the SED Investigation Report (see Appendix A-6), the PG&E welding crew welded a tapping tee onto a two-inch steel distribution main on 3rd Avenue, when the welding crew discovered that the steel distribution main had an inserted and unmapped 1 ¼-inch plastic line. The inserted plastic main was damaged by

the welding and tapping process which caused the natural gas to escape the plastic main. Natural gas migrated into the residential structure and later resulted in an explosion.

PG&E admitted that there were no records found on the installation of the inserted plastic on 3rd Avenue. PG&E also admitted that the only available document containing information about the main was Plat 3956-C08 that was used by the PG&E GC welding crew on the day of the incident. The Plat 3956-C08 map showed a 2-inch steel main on 3<sup>rd</sup> Avenue and did not reflect the inserted 1 ¼-inch plastic line. In addition to the error regarding the main, the Plat 3956-C08 also showed a ¾-inch steel service pipe instead of an inserted ½-inch plastic service.

The SED Investigation Report claimed that PG&E violated Title 49 CFR §192.605(b), among other violations, including Public Utilities Code §451, for its failure to update its records which led to the company providing incomplete information about the distribution main to its workers.

### **III. INITIATION OF INVESTIGATION**

Delivery of natural gas is potentially dangerous to the general public and to PG&E employees, especially when the distribution facilities are located in populated areas. Both members of the public and PG&E employees are entitled to expect that PG&E will transport gas as safely as reasonably possible. Indeed, California law requires Commission-regulated utilities to operate safely. Section 451 of the Public Utilities Code in part reads: “Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities..... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”

The SED Investigation Reports present us with a strong showing that PG&E may have violated applicable law. We infer that the state of PG&E’s records regarding critical infrastructure (in this case, its gas distribution pipelines) may have been inadequate to make critically important, ongoing safety decisions. We have before us sufficient evidence and good cause to commence a formal investigation to ascertain

whether such violations have occurred, and if so, to consider the proper penalties and remedies for such violations.

The Commission's focus will be to determine whether PG&E's gas safety recordkeeping has been conducted in a manner that violates the general provisions of Public Utilities Code §451, the recordkeeping violations cited in the SED Investigation Reports, and/or any other applicable law. Gas safety recordkeeping refers, but is not limited to, PG&E's acquisition, maintenance, organization, safekeeping, and efficient retrieval of data that the Commission finds is necessary and appropriate under the circumstances for PG&E to make good and safe gas engineering decisions, and thus to promote safety as required by Section 451 of the Public Utilities Code. Thus, the Commission institutes this formal proceeding pursuant to Rule 5.1 of the Commission's Rules of Practice and Procedure ("Rules")<sup>3</sup> to consider the allegations in the SED Incident Investigation Reports, and potentially responsive information from PG&E, in order to determine whether PG&E violated any provisions of the Public Utilities Code, Commission general orders or decisions, or other applicable standards, laws, rules or regulations. The Commission will investigate and decide whether PG&E's recordkeeping pertaining to gas distribution lines has violated good and accepted engineering standards and practices, and thus whether PG&E violated Section 451 of the Public Utilities Code or other laws and regulations.

Further, we will specifically consider what monetary fines and other remedies are appropriate in order to prevent PG&E's recordkeeping failures from endangering the public. We will also review the duration of violations per Public Utilities Code §2108. If supported by the evidence, the Commission will consider ordering daily fines for a significant period of time.

---

<sup>3</sup> All citations to Rules refer to the Commission's Rules of Practice and Procedure, which are codified at Chapter 1, Division 1 of Title 20 of the California Code of Regulations.

The Commission also invites interested parties to actively participate in this proceeding as it involves important safety and other policy matters that may benefit from the expertise, participation, and evidence of other parties.

#### **IV. PG&E REPORT**

The SED Investigation Reports provide us with reason to further weigh any violations of law that have occurred. Thus, we provide Respondent PG&E with its opportunity to contest any facts asserted in the SED Incident Investigation Reports. Further, the Commission directs PG&E to provide its contentions, with detailed facts supporting them.

PG&E is therefore directed to appear and provide a report, within 30 days of the issuance of this OII, to identify all reasons of law and fact known to PG&E to support the possibility that the company has committed no violation of law with respect to its gas distribution recordkeeping. Thus, PG&E is directed to file and serve a report on all known parties, which responds to the following directives:

1. List each factual contention stated, and conclusion reached, by the SED Incident Investigation Reports, regarding PG&E's recordkeeping, that PG&E contends is incorrect, and provide support for PG&E's position.
2. What explanation does PG&E offer for each recordkeeping failure claimed in the SED incident investigation reports?
3. What corrective actions has PG&E already taken in response to the recordkeeping failures identified in the SED incident investigation reports?
4. Provide the names (and titles if employee or agent) of all witnesses to the responses and information in the PG&E report. Provide the name of each such witness with respect to specified portions of the PG&E report.

The ordered report shall be based on information in PG&E's possession. No discovery on the Commission or its staff is warranted for PG&E to complete this report. As noted below, a moratorium on discovery conducted by PG&E on the



Commission and its staff shall be in place until otherwise directed by a Ruling in this proceeding.

## **V. PRELIMINARY SCOPING MEMO**

Rule 7.1(c) provides that an order instituting an investigation (OII) shall attach a preliminary scoping memo. The following discussion meets this requirement.

### **A. Issues Presented**

The Commission is charged with responsibilities under Public Utilities Code §§451, 701, 761, 768, and federal pipeline standards that we are certificated and authorized by the federal government to enforce (49 U.S.C. §60105, and General Order 112-E). The Commission bears a responsibility both to enforce laws utilities may have violated in the past, and to prevent future unsafe utility practices.

If the Commission determines that PG&E violated safety standards with respect to its gas system recordkeeping, the Commission will determine whether penalties pursuant to Public Utilities Code §§2107 and 2108 are warranted, and if so the amount appropriate to the facts and the law.

The Commission also intends to establish whether PG&E should reimburse the state for the cost accrued by the Commission staff or by its consultants for prosecution of this investigation, and the included SED incident investigations. Currently, the facts and circumstances presented to the Commission provide us with no justification to conclude that ratepayers should bear these costs.

This proceeding shall:

- (1) Determine whether PG&E violated any provisions of the Public Utilities Code, general orders, Commission decisions, federal gas safety regulations and laws that the federal government has authorized the Commission to enforce in California regarding its gas distribution recordkeeping, and/or other state or federal law.
- (2) Determine whether PG&E violated other recordkeeping-related rules, or requirements, regarding its procedures, training, and supervision, linked to distribution pipelines in PG&E's service territory.

- (3) Determine the penalty for any proven violation, in compliance with the law.
- (4) Determine whether PG&E shareholders or ratepayers shall bear the costs of this investigation, and the included SED incident investigations.

**B. Categorization of Proceeding**

This proceeding is categorized as adjudicatory. *Ex parte* communications are prohibited. The determination as to category is appealable under Rule 7.6.

**C. Need for Hearings and Schedule of Proceeding**

The Commission notifies PG&E that hearings will be set to review the issues raised in this matter. The Commission intends to set a prehearing conference to consider and adopt a hearing schedule and schedule other matters for this proceeding.

Pursuant to Rule 7.6(a), appeals of the categorization of this investigation, if any, are to be filed and served within 10 days of the date this OII is issued. Responses on this preliminary scoping memo may also be filed and served within 10 days of the date this OII is issued. Replies to responses may be filed and served within 5 days of the due date for responses.

A prehearing conference (“PHC”) may be scheduled after receipt of comments on the preliminary scoping memo. This OII shall be focused on gas distribution recordkeeping and related matters. Further, the assigned Commissioner may refine the issues to be addressed and determine the schedule and applicable procedures for this OII.

Appeal of categorization	10 days after issuance of this OII
Responses on scope and issues in Preliminary Scoping Memo	10 days after issuance of this OII
PG&E Report due	30 days after issuance of this OII
Subsequent Deadlines and Case Submission	To be Determined

A moratorium on discovery conducted by PG&E on the Commission and its staff shall be in place until otherwise directed by a Ruling in this proceeding. In contrast, pursuant to Public Utilities Code §314(a), the Commission and its staff may seek information from PG&E at any time. Thus, there shall be no moratorium on discovery conducted by the Commission and its staff on PG&E, at any time in this proceeding, unless otherwise directed by a Commission Decision. Further, even without the compulsion of a subpoena, the Commission hereby confirms that under Public Utilities Code §§313, 314, 314.5, 315, 581, 582, 584, 701, 702, 771, 1794, and 1795, the Commission staff may obtain information from utilities and is already deemed to have the general investigatory authority of the Commission.

**D. Comments**

We invite parties to comment on the range of issues identified above. In their comments, parties may state any objections to the order regarding the need for hearing, issues to be considered, or the proposed schedule. All filings in this proceeding may be made electronically according to Resolution ALJ-188 and served consistent with Rule 1.10.

**E. Parties and Service List**

PG&E is named as a Respondent to this investigation. SED is named as a party to this proceeding. The service list may be updated with additional parties.

**VI. SED INVESTIGATION REPORTS PUBLICALLY RELEASED**

Fundamentally, the public has the constitutional right to scrutinize Commission business,<sup>4</sup> which is undertaken on behalf of the public. In that vein, the Commission has the discretion to disclose investigation records under Section 583 of the Public Utilities Code.

---

<sup>4</sup> See Cal. Const. Art. 1, § 3(b)(1).

We exercise our discretion here as the public interest in transparency in this matter of critical public safety significance outweighs PG&E's interest in maintaining the confidentiality of the investigation records. By this Order the attached SED Investigation Reports are publically released.<sup>5</sup> Names of witnesses and residence addresses shall be redacted.

## VII. PUBLIC ADVISOR

Any person or entity interested in participating in this investigation who is unfamiliar with the Commission's procedures should contact the Commission's Public Advisor's Office in San Francisco at (415) 703-2074, (866) 849-8390, or email [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov); or in Los Angeles at (213) 576-7055, (866) 849-8391, or email [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov). The TTY number is (866) 836-7825. Written communication may be sent to the Public Advisor, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102.

## VII. INTERVENOR COMPENSATION

A party that expects to request intervenor compensation for its participation in this Investigation shall file its notice of intent to claim intervenor compensation in accordance with Rule 17.1.

Therefore, **IT IS ORDERED** that:

1. An investigation is instituted on the Commission's own motion to determine whether PG&E violated any provision of the Public Utilities Code, general orders, federal law adopted by California, other rules, or requirements, and/or other state or federal law, by its recordkeeping policies and practices with respect to its gas distribution service.
2. PG&E is named as Respondent to this investigation.
3. SED is named as a party to this proceeding.

---

<sup>5</sup> See Pub. Util. Code § 583.

4. The SED Reports present us with a strong showing that PG&E violated applicable law.

5. Respondent PG&E is directed to show at hearings why the Commission should not find it in violation of provisions of the Public Utilities Code, general orders, decisions, other rules, or requirements identified in this Order, and/or engaging in unreasonable and/or imprudent practices related to these matters, and why the Commission should not impose penalties. If any violation by PG&E is found, PG&E is directed to show why penalties and/or any other form of relief should not be applied. PG&E is also directed to file reports as required in this order no later than 30 days after the issuance of this OII and providing the information required and specified in this order.

6. PG&E is hereby given notice that fines may be imposed in this matter pursuant to Public Utilities Code §§2107 and 2108.

7. PG&E is hereby given notice that the Commission may order PG&E to implement measures designed to prevent future recordkeeping failures pursuant to Public Utilities Code §§451, 701, 761, and 768.

8. This Order includes a preliminary scoping memo.

9. Pursuant to Rule 7.1(c) of the Commission's Rules of Practice and Procedure, this proceeding is categorized as adjudicatory and deemed to require hearings.

10. *Ex parte* communications are prohibited in this proceeding.

11. A prehearing conference shall be convened before an Administrative Law Judge ("ALJ") for the purpose of establishing a schedule in this matter, including the date, time, and location of an evidentiary hearing, and for good cause shown the ALJ and/or Assigned Commissioner may extend the report deadlines specified herein, for any particular responses required.

12. A moratorium on discovery conducted by PG&E on the Commission and its staff shall be in place until otherwise directed by a Ruling in this proceeding.

13. There shall be no moratorium on discovery conducted by the Commission and its staff on PG&E, at any time in this proceeding, unless otherwise directed by a Commission Decision.

14. The attached SED Incident Investigation Reports are publically released. Names of witnesses and residence addresses shall be redacted.

15. The Executive Director shall cause a copy of this Order to be served electronically and by certified mail on the Respondent, PG&E, at:

Anthony F. Earley, Jr., CEO  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105

Lise H. Jordan, Law Department  
Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105  
[Lhj2@pge.com](mailto:Lhj2@pge.com)

This order is effective today.

Dated November 20, 2014, at San Francisco, California.

MICHAEL R. PEEVEY  
President  
MICHEL PETER FLORIO  
CATHERINE J.K. SANDOVAL  
CARLA J. PETERMAN  
MICHAEL PICKER  
Commissioners

## **EXHIBIT U**

1                                   **BEFORE THE PUBLIC UTILITIES COMMISSION**  
2                                   **OF THE STATE OF CALIFORNIA**

3           Order Instituting Investigation And Order  
4           to Show Cause on the Commission's Own  
5           Motion into the Operations and Practices  
6           of Pacific Gas and Electric Company with  
7           Respect to Facilities Records for its  
8           Natural Gas Distribution System  
9           Pipelines.

Investigation 14-11-008  
(Filed November 20, 2014)

10  
11  
12  
13           **PREPARED DIRECT TESTIMONY OF POLICE CHIEF MICHAEL CALHOUN**  
14           **ON BEHALF OF THE CITY OF CARMEL-BY-THE-SEA**

15  
16  
17  
18  
19                                   STEVEN R. MEYERS  
20                                   BRITT K. STROTTMAN  
21                                   EMILIE E. DE LA MOTTE  
22                                   Meyers, Nave, Riback, Silver & Wilson  
23                                   555 12th Street, Suite 1500  
24                                   Oakland, CA 94607  
25                                   Phone: (510) 808-2000  
26                                   Fax: (510) 444-1108  
27                                   E-mail: smeyers@meyersnave.com  
28                                   Attorneys for CITY OF CARMEL-BY-THE-SEA

October 14, 2015



1                                   **BEFORE THE PUBLIC UTILITIES COMMISSION**  
2                                   **OF THE STATE OF CALIFORNIA**

3                   Order Instituting Investigation And Order  
4                   to Show Cause on the Commission's Own  
5                   Motion into the Operations and Practices  
6                   of Pacific Gas and Electric Company with  
7                   Respect to Facilities Records for its  
8                   Natural Gas Distribution System  
9                   Pipelines.

Investigation 14-11-008  
(Filed November 20, 2014)

10                   **PREPARED DIRECT TESTIMONY OF POLICE CHIEF MICHAEL CALHOUN**  
11                   **ON BEHALF OF THE CITY OF CARMEL-BY-THE-SEA**

12                   **I.       WITNESS QUALIFICATIONS**

13                   My name is Michael Calhoun. My business address is at City Hall, Monte Verde  
14                   Street, Carmel-by-the-Sea, California 93921. I am the Director of Public Safety of the  
15                   City of Carmel-by-the-Sea ("Carmel"). I have served as Carmel's Director of Public  
16                   Safety since 2012. Prior to that, I served Carmel in the Police Department since 1984.

17                   This is the first time I have testified before the Commission.

18                   **II.     SUBSEQUENT GAS LEAKS IN CARMEL**

19                   I have prepared this testimony to show the California Public Utilities Commission  
20                   ("Commission") that the Carmel gas leak and explosion of March 3, 2014 caused by  
21                   Pacific Gas & Electric Company ("PG&E") was not a random, isolated event, but rather a  
22                   direct consequence of systemic failures in PG&E's safety culture.<sup>1</sup> As a first responder, it  
23                   is highly troubling, almost four years after the Line 132 PG&E explosion in San Bruno,  
24                   that Carmel and its residents witnessed the explosive spectacle of PG&E not managing its  
25                   as-built records and being unable to properly identify gas pipelines in the ground.  
26                   "Ground truthing" should have been a minimum standard safety practice. Under its

27  
28                   <sup>1</sup> See testimony of Mayor Jason Burnett, filed concurrently with my testimony.

1 franchise contract with PG&E and its general police powers, City officials in Carmel have  
2 a solemn duty to protect the health and welfare of City residents, businesses and visitors.  
3 This explosion could easily have killed and seriously injured people and PG&E's  
4 misconduct should not be ignored. The following list represents significant events that I  
5 have personal knowledge of involving PG&E's gas facilities and occurring within Carmel  
6 or just outside City limits that demonstrate that PG&E doesn't know what is in the ground.  
7 Each incident details the type of report, response, and any action or if no action taken.

8 1. Report of Damaged Sewer Lines, East Santa Fe Street and 3<sup>rd</sup> Ave. Resident  
9 Fred Siegel reported an incident at a City Council meeting involving damage to his sewer  
10 line caused by PG&E during a gas pipe replacement project. He also included information  
11 regarding an issue at Wilson and Judie Wendt's home. These incidents were not originally  
12 reported to the police. This occurred before the March 3, 2014 explosion.

13 At the March 4, 2014 Council meeting, resident Fred Siegel said that he had a sewer  
14 line backup and was without water or sewage for three days. He explained that he tried to  
15 speak to a PG&E contractor and plumber, but had a hard time getting through to someone  
16 on President's Day weekend. He tore his bathroom apart trying to find the source, but  
17 couldn't find it. He called Underground Construction Co, who said they would be down in  
18 three hours. Mr. Seigel was concerned that a gas line would be struck, so took the plumber  
19 off the case. Underground Construction found a rock had crushed and severed the  
20 drainage line. Mr. Seigel insisted that a camera be run down every pipe line in Carmel to  
21 see what is underground. Mr. Seigel learned that his neighbors, the Wendt's, were also out  
22 of water that weekend. Mr. Seigel reported that sewage has been sitting under their houses  
23 since the incident started. Mr. Seigel reported he would be forced to move out of home if  
24 not fixed quick due to asthma. In the meeting, Mr. Seigel berated PG&E for their poor  
25 management of the situation.

26 2. April 4, 2014 Hosfas House, Owner Carrie Theis. Hosfas House is a family-  
27 run inn in Carmel. A guest reported a smell of natural gas at approximately 9:00 a.m.  
28 Hosfas House personnel took action to shut off all pilot lights and gas sources to their

1 building. Upon calling PG&E's 1-800 number, the owner Ms. Theis<sup>2</sup> was told that the  
2 incident was not an emergency and units would not respond. At 2:00 p.m., Ms. Theis  
3 called then-City Administrator Jason Stilwell and reported the incident to him. At 2:30  
4 p.m. (over five hours later), PG&E units finally arrived to investigate. PG&E did find a  
5 small leak to the north wing of the property which left the owner to find other  
6 accommodations for three guests and make arrangements to contract a plumber. Because  
7 this occurred early morning on a Friday, a faster response by PG&E would have allowed  
8 the owner to fix the problem in a timely manner instead of waiting until the following  
9 Monday. The owner incurred a significant loss in revenue.

10 3. July 15, 2014, Perry Newberry and 6<sup>th</sup> Ave. A third party reported a smell of  
11 natural gas to Mayor Jason Burnett in this area. The call was received at 5:46 p.m. and  
12 police and fire units responded. A front line staff person for PG&E was on scene at 6:00  
13 p.m., but the gas leak was not contained until 6:27 p.m. PG&E Supervisor, Gordon  
14 Fehlman arrived at approximately 6:27 p.m.

15 4. September 5, 2014, Camino Real and 11th Ave. At 11:52 a.m., Carmel  
16 Police Department received a report of a gas leak in the roadway. The cause of the leak  
17 was determined to be a third party contractor (Monterey Peninsula Engineering) rupturing  
18 a three-inch plastic gas line. Because of a large cloud of gas, the Sea View Inn and  
19 residents along both sides of Camino Real between 11th and 12th were evacuated. PG&E  
20 employees arrived on scene at 12:01 p.m. Its employees did not have the proper tools to  
21 stop the leak and called another PG&E crew. At 12:25 p.m., another PG&E crew arrived.  
22 It was not until 1:24 p.m. that the gas line was crimped and the leak stopped.

23 5. February 28, 2015 at Hwy. 1 & Via Castanada. At 11:42 a.m., Monterey  
24 Fire units responded and provided mutual aid assistance for a large gas leak near Highway  
25 1 and Holman highway within the jurisdiction of Cal Fire. CHP closed Hwy. 1  
26 Northbound and Southbound, which created a large backup of traffic in Carmel for several

27  
28 <sup>2</sup> Ms. Theis is a Carmel Councilmember.

1 hours. The cause of the gas leak was determined from a third party contractor rupturing a  
2 gas line. PG&E gas service representative responded at 12:01 p.m. and the repair crew  
3 arrived at 12:15 p.m. PG&E Government Relations Representative Joe Foster was in  
4 communication with me regarding possible impacts to Carmel.

5 6. April 6, 2015, Santa Fe & 2<sup>nd</sup> Ave. At 6:00 p.m., resident Teresa Wiseman  
6 discovered the gas line to her home was not connected and called PG&E. Ms. Wiseman  
7 reported that PG&E crews were working on her street to replace an old gas line and install  
8 new hookups to each residence. PG&E repaired the street after completing the job. It was  
9 later determined that PG&E did not have the proper map: Wiseman's house was not  
10 identified on the map and the map displayed the old main. Ms. Wiseman's house was  
11 purchased in the 50s. Ms. Wiseman reported that PG&E conducted an investigation to  
12 determine why her house was not listed on the map. PG&E crews did respond later in the  
13 evening to fix the problem and had to re-dig up the street to connect her home to the new  
14 main.

15 7. August 19, 2015 at Lincoln and Fifth Ave. A Carmel resident (who wishes  
16 her identity to be withheld) reported to me that she noticed a water leak and called to  
17 report. Contractor Cal Am was there in a matter of minutes. The resident spoke with the  
18 Cal Am contractor to inquire whether a crew would come to handle the water leak. The  
19 Cal Am representative said yes, but they would have to wait for PG&E to come verify  
20 there were no gas lines in the ground where they needed to dig. The Cal Am  
21 representative told the resident that PG&E often takes a long time to show up — and  
22 sometimes doesn't respond at all. The Cal Am representative told the resident that if  
23 PG&E didn't show up, Cal Am crew would have to dig as carefully as possible, since  
24 Cal Am can't just let the water run down the street indefinitely. The resident informed me  
25 she saw the Cal Am crew standing around for several hours apparently waiting for the  
26 PG&E crew to arrive.

27 This concludes my prepared direct testimony.  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Respectfully submitted on behalf of Police Chief  
Calhoun,

/s/ Steven R. Meyers

Steven R. Meyers  
Britt K. Strottman  
Emilie E. de la Motte  
Meyers, Nave, Riback, Silver & Wilson  
555 12th Street, Suite 1500  
Oakland, CA 94607  
Phone: (510) 808-2000  
E-mail: smeyers@meyersnave.com  
Attorneys for CITY OF CARMEL-BY-THE-SEA

October 14, 2015

## **EXHIBIT V**

Investigation: 11-02-016  
Exhibit No.: \_\_\_\_\_  
Date: \_\_\_\_\_  
Witnesses: \_\_\_\_\_

---

**PACIFIC GAS AND ELECTRIC COMPANY'S  
RESPONSE TO THE CONSUMER PROTECTION AND SAFETY  
DIVISION'S REPORTS:**

**RECORDS MANAGEMENT WITHIN THE GAS TRANSMISSION  
DIVISION OF PG&E PRIOR TO THE NATURAL GAS TRANSMISSION  
PIPELINE RUPTURE AND FIRE, SAN BRUNO, CALIFORNIA,  
SEPTEMBER 9, 2010**

**AND**

**REPORT AND TESTIMONY OF MARGARET FELTS**

**TESTIMONY OF WITNESSES**

---



**PACIFIC GAS AND ELECTRIC COMPANY**  
**EXPERT REPORT OF**  
**MAURA L. DUNN, MLS, CRM, PMP**



## TABLE OF CONTENTS

			Page
1	A.	The Assignment .....	1
2	B.	Expert Background and Qualifications .....	1
3	C.	Summary of Assignment, Scope and Methodology.....	4
4	1.	Information Sources .....	4
5	2.	Conduct of Information Review and Analysis .....	5
6	D.	Summary of Opinions.....	5
7	1.	The Duller/North Report Largely Misses the Mark.....	5
8	2.	PG&E's Records Retention Policies Met Applicable Regulatory	
9		Recordkeeping Requirements .....	6
10	3.	PG&E's Pipeline Records Integration Program, Combined with a	
11		Comprehensive, Enterprise-wide Records Management	
12		Program, Provides a Strong Foundation for a Robust Future	
13		State .....	6
14	E.	Expert Opinions.....	7
15	1.	The Duller/North Report Largely Misses the Mark.....	7
16	a.	Process-centric vs. records-centric evaluation.....	16
17	b.	De-centralized Versus Centralized Records Management	
18		Program .....	20
19	c.	Benchmarking: PG&E's records management program is	
20		not unlike other utilities' programs .....	24
21	2.	PG&E's Retention Policies Met Applicable Regulatory	
22		Recordkeeping Requirements .....	38
23	a.	ASME Standard B31.8.....	39
24	b.	Regulators Have Not Always Been Prescriptive or	
25		Consistent in Stating Recordkeeping Requirements.....	40

**TABLE OF CONTENTS**  
(continued)

	<b>Page</b>
1                   c.     Retention Schedules Are Not the Only Source of	
2                         Retention Policy Guidance.....	41
3           3.     PG&E's Pipeline Records Integration Program, Combined with a	
4                         Comprehensive, Enterprise-wide Records Management	
5                         Program, Provides a Strong Foundation for a Robust Future	
6                         State .....	55
7   F.     Conclusion .....	68

1       hardcopy documents and photographs. I thought about the need to catalog  
2       physical objects along with the documents that described them, but the  
3       scientists on the steering committee were confused by what they called 'an  
4       accountant's view' of the museum – in other words, a traditional catalog of  
5       documents linked to museum assets was not helpful to them. Instead,  
6       together we developed a matrixed approach to identifying collection objects,  
7       unaccessioned collection objects and the information assets associated both  
8       directly and indirectly with the objects. In addition to cataloging/bibliographic  
9       metadata, we defined technical, scientific, transactional and access  
10      metadata. The scientists who both created and used the records were able  
11      to design a strategy that met all of their needs, not only the needs of records  
12      managers or librarians who focus first on documents and try to access the  
13      physical assets through them, instead of the other way around.<sup>44</sup>

14      **b. De-centralized Versus Centralized Records Management Program**

15             Dr. Duller and Ms. North make the point repeatedly that PG&E did  
16             not have a central point of authority nor a centralized program for  
17             records management.

18                     "PG&E appears to have evolved with a decentralized records  
19                     management structure, with the responsibility for managing  
20                     records residing firmly within each Division and undertaken  
21                     locally by engineers and a number of document control clerks or  
22                     their equivalent."<sup>45</sup>

23             "At the time of the San Bruno pipeline rupture and fire PG&E did not  
24             have a centralized records management function. However, there were  
25             a number of employees who were tasked with the management of  
26             specific gas records located in different areas of PG&E."<sup>46</sup>

27             In making this point, Dr. Duller and Ms. North seem to assume that  
28             central control is always more desirable than distributed control. The  
29             GARP® principle of Accountability supports this assumption, but you

---

<sup>44</sup> Booz Allen Hamilton, Inc., Smithsonian Institution National Museum of Natural History Digital Asset Management Strategy, September 2007.

<sup>45</sup> Duller/North Report at 6-26.

<sup>46</sup> Duller/North Report at 6-27.

1 comprehensive, centralized collection of gas related records than had  
2 existed in the previous 20 or more years.<sup>108</sup>

3 Several different existing business systems were pulled into action to  
4 accommodate the urgent pace of this scanning and indexing activity.  
5 Specifically, ECTS (based on Assurix software) has the ability to hold  
6 images and was the original repository of the scanned documents. To date,  
7 approximately 3.2 million pages have been scanned as single-page TIFF  
8 images.<sup>109</sup> Staff are able to access the images remotely, increasing  
9 efficiency and use of these valuable documents. However, ECTS was never  
10 seen as the final repository for the images and PG&E recognized that this  
11 was not its intended use, and it was not a good long-term fit.

12 Documentum has been selected as PG&E's enterprise content  
13 management and enterprise records management platform. Currently in  
14 pilot, the ECTS repository of MAOP Validation documents has been  
15 mirrored in Documentum.<sup>110</sup> Eventually, Documentum will be the official  
16 repository not only of these MAOP Validation documents but of all pipeline-  
17 related documentation, linked to other key data stored in the GIS and  
18 enterprise resource planning system (SAP).<sup>111</sup> This integration is described  
19 in greater detail later in this report.

20 In addition, two tracking systems were used by the MAOP Validation  
21 staff: Filemaker to track folders, bar codes, and box/job folder location in the  
22 warehouse (an onsite storage room in Emeryville containing approximately  
23 5000 boxes of collected documents that are somewhere in the scanning  
24 process (most are complete).<sup>112</sup> Finally, the team is using Project Tracker

---

<sup>108</sup> NTSB Telephone interview, June 27, 2011, with Larry Medina indicates that centralized management of pipeline files was dispersed after 1993 based on pressure limits of pipes (i.e., pipes operating at >60psi) became the responsibility of the Distribution group; also around this time, as office moves and other reorganizations took place, records were transferred to new offices or to the records center or were inadvertently lost in the process, PG&E June 20, 2011, filing, Chapter 2A.

<sup>109</sup> Phase 3 includes linking these single page TIFFs so that documents are physically as well as logically together.

<sup>110</sup> Interview with Charu Jain, Leslie Banach, Christopher Vana, May 16, 2012.

<sup>111</sup> Interviews with Steve Whelan, May 16, 2012, and Sumeet Singh, May 17, 2012.

<sup>112</sup> Interview with Brian Daubin, Valda Sanders and Rajpreet Basuta on May 15, 2012.

1 records management programs and initiatives, and supporting the  
2 implementation of records management policies and tools. This level of  
3 human resource commitment is unusual and indicates a good understanding  
4 on PG&E's part of the challenges they face in establishing a culture where  
5 information is considered integral to doing a good job, not an afterthought  
6 that is someone else's problem to manage. This Steering  
7 Committee/Working Team approach also indicates that PG&E intends to  
8 continue its process-centric approach to records management as that  
9 approach best meets their needs, especially on a daily, operational level.

10 While the steering committee is essential to full enterprise-wise program  
11 implementation, the program needs a single point of authority and  
12 leadership. To address this need, PG&E recently hired a Director of  
13 Information Management Compliance. The Director has established four  
14 high level objectives<sup>126 127</sup> for the program:

- 15 1. Create one central electronic location/placeholder for corporate  
16 records that will allow the right people at the right time to retrieve the  
17 record
- 18 2. Manage information in a way that meets regulatory compliance as  
19 well as the needs of the business
- 20 3. Design processes that demonstrate PG&E practices record-keeping  
21 in a legally defensible environment
- 22 4. Reassure users that they are not giving up control of their  
23 information and that they are contributing to PG&E's information  
24 management maturity

25 And associated long-term goals:<sup>128</sup>

- 26 1. Declare, store, manage and retrieve records in a uniform way  
27 across PG&E

---

**126** Interview with Leslie Banach, Director - Information Management Compliance, May 15, 2012.

**127** PG&E Records Management Program Goals and Objectives, undated, provided during interview with Leslie Banach, Director of Information Management Compliance, May 15, 2012.

**128** PG&E Records Management Program Goals and Objectives, undated, provided during interview with Leslie Banach, Director of Information Management Compliance, May 15, 2012.

2. Create processes to support new policy and standards' expectations
3. Design a program that identifies the official, authenticated record (final version proven to be unalterable)
4. Define a process for disposing of/deleting information that is auditable, legally defensible, and meets regulatory requirements.

During my discussion with the Director, she elaborated on several of these objectives and goals. She has drafted a new records management policy and is awaiting approval to distribute it. Her top priority in the next few months is to create an enterprise records retention schedule, eliminating the confusion that currently exists with the many different sources of records retention guidance throughout the organization. It will be important that this retention schedule is harmonized with the retention information currently embedded in the standard practice documents, as a first step. Over time, PG&E must decide whether to centralize all retention information into its enterprise retention schedules and, if so, must engage in a comprehensive effort to update those standard practices currently containing the information and remove it to avoid confusion.

The Director's support of the Documentum rollout dovetails with the overarching plan for Project Mariner, discussed above. In particular, she is developing an enterprise-wide, high-level taxonomy to consistently identify asset-related and other critical documents whether for gas transmission or distribution, electric supply or power generation. This taxonomy<sup>129</sup> will increase consistency and minimize confusion and conflict in identifying information throughout the organization.

In summary, PG&E's approach to managing pipeline-related data going forward fully meets both the letter and spirit of the "traceable, verifiable and complete" requirement. The completion of the MAOP Validation effort, along with the other aspects of the Pipeline Records Integration Program will lay a robust foundation on which PG&E can build a program that not only protects and preserves information but allows users maximize the value of these information assets, resulting in increased productivity, increased safety and reduced costs. PG&E has hired a Director of Information

---

<sup>129</sup> PG&E Enterprise Taxonomy, undated, provided during interview with Leslie Banach, Director of Information Management Compliance, May 15, 2012.

1 Management Compliance to spearhead the creation of its first truly  
2 enterprise-wide records and information management program and has  
3 established a Records Management Steering Committee to support the  
4 central program development and implementation across the Company.  
5 Finally, the efforts that started in the Gas Operations Division in response to  
6 the tragic events at San Bruno and the subsequent regulatory scrutiny will  
7 be harmonized with the forthcoming enterprise-wide initiatives ultimately  
8 providing PG&E with a very strong information-based culture.

## 9 **F. Conclusion**

10 Overall, I believe that the Duller/North Report focuses on a few admittedly  
11 negative elements of PG&E's records management program as it existed over  
12 the past 50 years. Based on these few points, CPSD's experts extrapolate that  
13 PG&E neglected its obligations to its regulators and the public in terms of  
14 creating, maintaining and preserving appropriate records. Based on my review  
15 of the same documents, I cannot reach this conclusion. I agree that the  
16 program had flaws, but I also find that there were attempts to determine the  
17 appropriate retention information (e.g., PG&E's interaction in the mid-1970s  
18 asking the Commission for more clear direction related to records retention). I  
19 find that the embedding of records retention instructions in standard practice  
20 documents rather than in a centrally issued records retention schedule is not  
21 unusual and met the needs of the engineers at the time.

22 PG&E has acknowledged these shortcomings and is committing significant  
23 resources to creating a more robust records management environment for the  
24 future, in support of meeting the "traceable, verifiable and complete"  
25 recordkeeping requirement. I find their plan to be a good start with many  
26 innovative ideas. Execution of the plan will require diligence on the part of Gas  
27 Operations, the enterprise-wide records management program, and all other  
28 parts of the company. Critical to the success of the plan is a necessary change  
29 in PG&E's culture, moving from a culture focused on daily operations to one that  
30 lives the idea that information is an integral part of those daily operations.

31 The Duller/North Report fails to provide real insight into PG&E's records  
32 management program over time. The alleged violations found by CPSD's  
33 experts are based on an incomplete review of the existing documents, focusing  
34 solely on the centrally-issued records retention schedules and ignoring the

## APPENDIX C – PG&E STAFF INTERVIEWED

<b>Name</b>	<b>Correct Spelling</b>	<b>Titles</b>
Tuesday, May 15, 8:00am, Emeryville	Brian M Daubin	Director - Production Maps and Records
	Valda M Sanders	Engineering Manager - Data & MAOP Validation Program
	Rajpreet Basuta	Supervisor(r)- MAOP/Emeryville - Data & MAOP Validation Program
Tuesday, May 15, 1:00pm, Bayshore	Joseph W McClain	Supervisor - Records Center
	Steve L Puccinelli	Records Analyst - Records Center
Tuesday, May 15, 2:00pm, 77 Beale Street	David Kelly	Director- Corporate Secretary
Tuesday, May 15, 3:00pm, 77 Beale Street	Leslie Banach	Director - - Information Management Compliance
Wednesday, May 16, 9:00am, 77 Beale Street	Charu Jain	VP, Business Technology
	Christopher L Vana	Christopher L Vana - Information Technology
	Leslie Banach	Director - - Information Management Compliance
Wednesday, May 16, 11:00am, Walnut Creek	Steve A Whelan	Sr. Director - Gas Engineering & Operations
Wednesday, May 16, 2:00pm, Walnut Creek	Joe A Medina	Director -Transmission Process & MAOP Validation
Thursday, May 17, 9:30am, Walnut Creek	Sumeet Singh	Senior Director-Asset Knowledge Management



**PACIFIC GAS AND ELECTRIC COMPANY'S  
RESPONSE TO THE CONSUMER PROTECTION AND SAFETY DIVISION'S  
REPORTS:**

**RECORDS MANAGEMENT WITHIN THE GAS TRANSMISSION DIVISION OF PG&E  
PRIOR TO THE NATURAL GAS TRANSMISSION PIPELINE RUPTURE AND FIRE,  
SAN BRUNO, CALIFORNIA, SEPTEMBER 9, 2010**

**AND**

**REPORT AND TESTIMONY OF MARGARET FELTS**

**TABLE OF CONTENTS**

CHAPTER	TITLE	WITNESS
	INTRODUCTION	SUMEET SINGH
1	RECORDS MANAGEMENT REQUIREMENTS AND ASSESSMENT METHODOLOGY	
1A	PIPELINE SAFETY REGULATORY OVERVIEW	CESAR DE LEON
1B	RECORDKEEPING PRACTICES IN THE NATURAL GAS INDUSTRY	JAMES B. HOWE
1C	THE DULLER/NORTH REPORT'S RECORDS MANAGEMENT ALLEGATIONS LARGELY MISS THE MARK	MAURA L. DUNN
1D	GAS TRANSMISSION RECORDS IMPROVEMENT EFFORTS	SUMEET SINGH
1E	PG&E'S PIPELINE RECORDS INTEGRATION PROGRAM, COMBINED WITH A COMPREHENSIVE ENTERPRISE-WIDE RECORDS MANAGEMENT PROGRAM, PROVIDES A STRONG FOUNDATION FOR A ROBUST FUTURE STATE	MAURA L. DUNN
2	RECORD RETENTION REQUIREMENTS AND PRACTICES	
2A	OVERVIEW OF PG&E'S RECORDS RETENTION STANDARDS AND PRACTICES	STEVEN PHILLIPS
2B	PG&E'S RECORDS RETENTION POLICIES MET APPLICABLE REGULATORY RECORDKEEPING REQUIREMENTS	MAURA L. DUNN

**PACIFIC GAS AND ELECTRIC COMPANY'S  
RESPONSE TO THE CONSUMER PROTECTION AND SAFETY DIVISION'S  
INCIDENT INVESTIGATION REPORT:**

**RECORDS MANAGEMENT WITHIN THE GAS TRANSMISSION DIVISION OF PG&E  
PRIOR TO THE NATURAL GAS TRANSMISSION PIPELINE RUPTURE AND FIRE,  
SAN BRUNO, CALIFORNIA, SEPTEMBER 9, 2010**

**AND**

**REPORT AND TESTIMONY OF MARGARET FELTS**

**TESTIMONY OF WITNESSES  
TABLE OF CONTENTS  
(CONTINUED)**

CHAPTER	TITLE	WITNESS
3	PG&E'S USE OF RECORDS	
3A	EXPERT TESTIMONY OF JOHN ZURCHER REGARDING HISTORICAL RECORD KEEPING PRACTICES IN THE NATURAL GAS PIPELINE INDUSTRY	JOHN ZURCHER
3B	PG&E'S GAS TRANSMISSION SYSTEM	M. KIRK JOHNSON
3C	HOW PG&E HAS HISTORICALLY USED GAS PIPELINE RECORDS	DAVID HARRISON
3D	EARTHQUAKE RISKS AND THE GPRP	KAREN ROTH
3E	INTEGRITY MANAGEMENT AND RECORDS	SARA PERALTA
3F	LEAK RECORDS	CHRISTINE COWSERT-CHAPMAN
3G	THE QUALITY OF GIS DATA	CHRISTINE COWSERT-CHAPMAN
4	RECORDS ALLEGATIONS AND THE SAN BRUNO ACCIDENT	
4A	SEGMENT 180 RECORDS RELATED TO CONSTRUCTION AND RECONDITIONED PIPE	DAVID HARRISON
4B	POST-INSTALLATION PRESSURE TEST AND RECORDS FOR SEGMENT 180	DAVID HARRISON

**PACIFIC GAS AND ELECTRIC COMPANY'S  
RESPONSE TO THE CONSUMER PROTECTION AND SAFETY DIVISION'S  
INCIDENT INVESTIGATION REPORT:**

**RECORDS MANAGEMENT WITHIN THE GAS TRANSMISSION DIVISION OF PG&E  
PRIOR TO THE NATURAL GAS TRANSMISSION PIPELINE RUPTURE AND FIRE,  
SAN BRUNO, CALIFORNIA, SEPTEMBER 9, 2010**

**AND**

**REPORT AND TESTIMONY OF MARGARET FELTS**

**TESTIMONY OF WITNESSES  
TABLE OF CONTENTS  
(CONTINUED)**

CHAPTER	TITLE	WITNESS
4C	RECORDS USED BY PG&E TO ESTABLISH MAOP FOR LINE 132	STEVEN PHILLIPS
4D	MILPITAS TERMINAL ON SEPTEMBER 9, 2010	MARK KAZIMIRSKY/ KEITH SLIBSAGER
4E	SUPERVISORY CONTROL AND DATA ACQUISITION (SCADA) SYSTEM	MARK KAZIMIRSKY/ KEITH SLIBSAGER
4F	PG&E'S EMERGENCY RESPONSE	BENEDICT ALMARIO
4G	EXPERT REVIEW OF PG&E'S EMERGENCY RESPONSE PLAN	DAVID BULL
5	ALLEGED DEFICIENCIES IN DATA REQUEST RESPONSES	JONATHAN SEAGER
6	STATEMENTS OF QUALIFICATIONS	

## CHAPTER 1D

### GAS TRANSMISSION RECORDS IMPROVEMENT EFFORTS

PG&E recognizes that it needs to improve its records and information management practices at an enterprise level and within its gas transmission organization. Its efforts to improve begin with the first principle that its records, including its gas transmission records, are key corporate assets. Going forward PG&E's records must deliver real time and accurate (traceable, verifiable, and complete) information about its gas pipeline system.

This section describes PG&E's efforts to transform its asset knowledge and records management practices. It explains the strategic records management plan taking shape at an enterprise level. It also addresses recent organizational changes aimed at implementing and sustaining records management improvements. These include significant organizational changes that emphasize asset knowledge management.

The gas organization has set a goal of achieving Publicly Available Specification (PAS) 55 certification. First published in 2004, PAS 55 reflects an international consensus about required good practices in the management of physical assets such as gas pipeline systems. Along the path to PAS 55 certification, PG&E intends to address the records management assessment recommendations it received earlier this year from its external records management consultant, PricewaterhouseCoopers (PwC).

#### **1. Organizational Improvements**

##### **a. Enterprise Records Management Strategy**

PG&E has begun to create a new Enterprise Records Management organization to develop and implement a company-wide Records Management policy. The Enterprise Records Management organization will: promote transparency and accountability for Records Management; protect vital records and enhance disaster planning; and ensure appropriate records retention practices. A cross-organizational steering committee guides the development of standards and policies associated with records management.

1           The committee is co-led by Karen Austin, Senior Vice President and  
2           Chief Information Officer, and Hyun Park, Senior Vice President and  
3           General Counsel of PG&E Corporation. Its members include Line of  
4           Business (LOB) representatives from Gas Operations, Electric Operations,  
5           Customer Care, Energy Supply, Regulatory Relations, Legal, Finance,  
6           Shared Services, Information Technology, and Human Resources. In  
7           addition, each LOB has a smaller working group formed to tackle particular  
8           records management challenges unique to that LOB.

9           In April 2012, PG&E hired Leslie Banach as the Company's Director of  
10          Information Management Compliance. She will direct the Company's  
11          Enterprise Records Management strategy. Ms. Banach formerly consulted  
12          with numerous large publicly-traded companies on records management  
13          practices. She reports directly to the Vice President and Managing Director  
14          of the Law Department.

15          Ms. Banach's key priorities include:

- 16          • Rollout of new policies and standards in partnership with the
- 17          Compliance & Ethics Department;
- 18          • Define records accountability across the enterprise;
- 19          • Standardize multiple records retention schedules;
- 20          • Help the business identify record types;
- 21          • Address the storage and conversion of paper records;
- 22          • Work with IT to address Systems of Record; and
- 23          • Support Documentum<sup>21</sup> rollout and prioritization.

24          She is also assisting the Gas Organization in formulating a strategy for  
25          responding to records management improvement recommendations that the  
26          organization received from PwC on March 31, 2012.

27          At an enterprise-level, PG&E has begun building Enterprise Content  
28          Management solutions, including an enterprise search for records, the  
29          building out of an Information Governance and Retention Plan, an

---

<sup>21</sup> Documentum has been selected as PG&E's Enterprise Content Management and Enterprise Records Management platform.